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Environmental Protection Agency, Denver, Colo

May 77

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Pursuant to EPA policies, guidelines and regulations under Section 208 of the Federal Water Pollution Control Act Amendments of 1972, EPA action on water quality management plans is subject to NEPA review. EPA has determined that its action on the Water Quality Management Plan for El Paso and Teller Counties is a major federal action that may have significant effects on the environment, and that an environmental impact statement is necessary to provide an opportunity for public review of EPA's decisions on plan approval. The format of this EIS is unique in that it highlights the issues raised by the plan while incorporating, by reference to the plan documentation, the basic information and analyses that normally constitute an EIS. This approach is made possible by the water quality management planning process, which is designed to incorporate and document all of the elements of an environmental impact statement in the planning/decision-making process. In addition, EPA has complied with its NEPA responsibility to conduct an independent, objective evaluation of the plan by participating with the Pikes Peak Area Council of Governments in an advisory capacity during the two-year plan development period.

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EPA SUMMARY

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WATER QUALITY MANAGEMENT PLAN
EL PASO and TELLER COUNTIES

MAY, 1977

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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FINAL ENVIRONMENTAL IMPACT STATEMENT

[redacted] WATER QUALITY MANAGEMENT PLAN FOR EL PASO AND TELLER COUNTIES, COLORADO

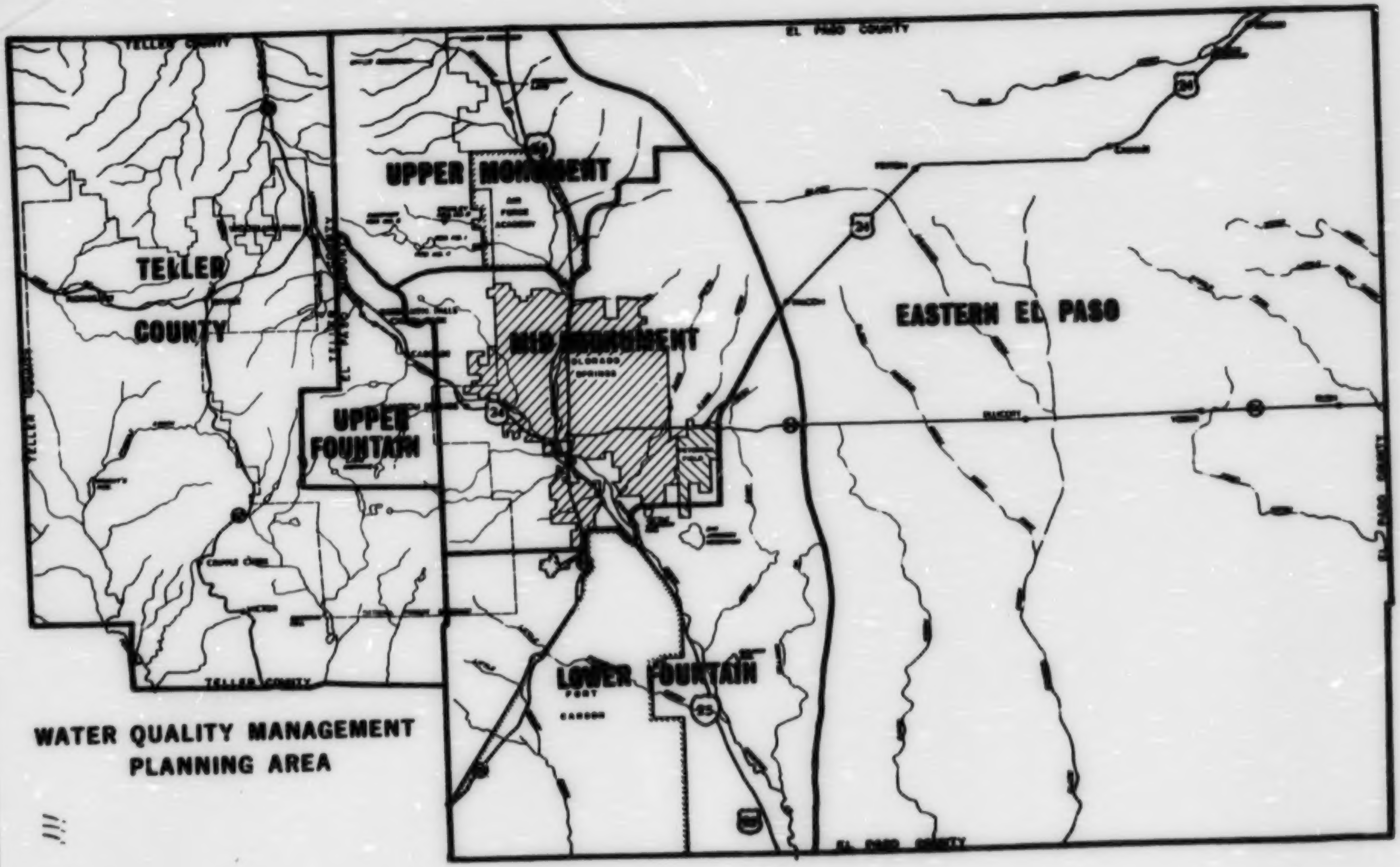
Prepared by

U.S. Environmental Protection Agency
Region VIII Denver, Colorado

Approved by

John A. Green
Regional Administrator

May, 1977
Date


EL PASO COUNTY
TELLER COUNTY
TELLER
COUNTY
UPPER MONUMENT
AIR FORCE ACADEMY
MID MONUMENT
COLORADO SPRINGS
UPPER FOUNTAIN
LOWER FOUNTAIN
FORT CARSON
EASTERN EL PASO
24
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TELLER COUNTY
EL PASO COUNTY

WATER QUALITY MANAGEMENT
PLANNING AREA

SUMMARY SHEET

Environmental Impact Statement
208 Water Quality Management Plan for
El Paso and Teller Counties, Colorado
EPA Project Number: P 008070

( ) Draft (X) Final

1. **Name of Action**: (X) Administrative ( ) Legislative

2. **Description of Action**:

Pursuant to EPA policies, guidelines, and regulations under section 208 of the Federal Water Pollution Control Act, EPA approval, conditional approval, or disapproval of water quality management plans is subject to NEPA review. EPA has determined that its action on the Water Quality Management Plan for El Paso and Teller Counties is a major Federal action that may have significant effects on the environment and that an environmental impact statement is necessary in order to provide an opportunity for public review of EPA's decisions on plan approval. The format of the EIS is unique in that it highlights the issues raised by the plan while incorporating, by reference to the plan itself, the basic information and analyses that normally constitute an EIS. This unique approach is made possible by the water quality management planning process, which is designed to incorporate and document all of the elements of an environmental impact statement in the planning/decision-making process.

The Water Quality Management Plan for El Paso and Teller Counties makes recommendations regarding stream classifications and criteria, wastewater treatment facility needs, and the regulatory/fiscal/institutional programs to implement the plan. The plan addresses the problems of point and nonpoint sources of water pollution in the two-county area.

The water quality management plan is based on a projected population for the urbanizing area of 550,000 by the year 2000. This compares to a 1976 estimated population of 304,000. Facility needs and feasibility studies were prepared for the two-county area based on these projections. Numerous other recommendations were made which relate to septic tank operation and maintenance, urban stormwater management, subdivision reviews, water quality monitoring and enforcement of regulatory programs, and designation of management agencies to implement the plan.

3. Environmental Impacts:

A. Growth Related Impacts

(1) Air quality modeling predicts an air quality standards violations for three hour hydrocarbon and twenty-four hour particulates by the year 2000.

(2) Natural ecologic systems and open space will be impacted.

(3) Neighborhood stability may be impacted.

(4) Noise pollution will increase.

(5) Need to reuse wastewater will increase.

(6) Raw water needs will increase the demand for western slope diversions.

(7) Demand for groundwater supplies will increase.

(8) Less water will be discharged to Fountain and Monument Creeks, resulting in smaller flows and slightly altering the visual/recreational characteristics of these streams.

(9) Need for other community services will increase (schools, health care, police protection, transportation).

(10) Stormwater runoff will increase.

B. Wastewater Collection and Treatment Facility Related Impacts

(1) Water quality will be maintained and/or improved.

(2) Some construction will occur in the flood plains.

(3) Provision of excess sewerage capacity may remove a growth constraint imposed by present lack of such service.

(4) Urban growth will tend to occur in areas providing sewerage treatment capacity.

4. Alternatives:

A. Growth

   (1) Infilling and satellite cities - moderate growth (550,000 people by year 2000)

   (2) Infilling and slow growth (365,000 people by year 2000)

   (3) Satellite cities (550,000 people by year 2000)

   (4) Current trends (550,000 people by year 2000)

B. Wastewater Collection and Treatment Systems

   (1) Large scale regionalization

   (2) Subbasin regionalization

   (3) Existing treatment configurations

   (4) Reuse - agricultural, industrial, landscape, culinary/potable water supply

C. Institutional Arrangements for Water Quality Management

   (1) Status Quo

   (2) Subbasin associations - joint exercise of powers agreement

   (3) Contracts

5. Distribution:

Appendix B shows the agencies, groups, and individuals to whom this EIS is being circulated.

6. Draft Statement Sent to Council on Environmental Quality:
March 25, 1977

7. Final Statement Sent to Council on Environmental Quality:
May 19, 1977

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List of Abbreviations

AQMA - Air Quality Maintenance Area

AQMP - Air Quality Maintenance Plan

EIS - Environmental Impact Statement

EPA - Environmental Protection Agency

NEPA - National Environmental Policy Act

NPDES - National Pollution Discharge Elimination System

PPACG - Pikes Peak Area Council of Governments

PRPC - Pueblo Regional Planning Commission

TDS - Total Dissolved Solids

TSS - Total Suspended Solids

USGS - United States Geological Survey

WQCC - Water Quality Control Commission (State of Colorado)

208 - Section 208 of the Federal Water Pollution Control Act, which provides for the development of the water quality management plans.

Introduction

Section 208 of the Federal Water Pollution Control Act provides for water quality management planning on an areawide basis. These areawide water quality management plans are designed to deal with existing or potential water quality problems of urban or industrial complexes and other areas. The plan must address a number of functional aspects of water quality management, such as estimating wastewater treatment facilities' needs and development programs to control pollution from dispersed or nonpoint sources. Through a combination of technical planning, intergovernmental coordination, and involvement by elected officials and the public at large, the 208 planning process is designed to give rise to water quality management plans that solve water quality problems while being sensitive to air quality management needs, land use planning, and other environmental concerns.

EIS Format

This EIS does not use the standard EIS format which is normally used by Federal agencies. The reason for using a modified format is that the water quality management plan developed by the Pikes Peak Area Council of Governments (PPACG) includes the requirements of the National Environmental Policy Act as an integral part of the plan. This integration of the NEPA process with the water quality management planning process is required by EPA regulations and guidelines. Throughout the two-year planning process, the Pikes Peak Area Council of Governments utilized the NEPA process to evaluate the environmental impacts of various alternatives which were under consideration.

EPA has a responsibility under NEPA to conduct an independent, objective evaluation of this plan before making a final decision. EPA has complied with this responsibility by participating with the Pikes Peak Area Council of Governments in the development of the plan over the two-year period. While the recommendations in the plan represent the results of a local decision-making process, EPA assigned staff personnel to work with the Pikes Peak Area Council of Governments in an advisory capacity throughout the two-year planning period.

Since the NEPA requirements were integrated into the planning process and EPA personnel participated in the development of the plan, EPA does not consider it necessary to prepare a separate EIS document in the standard EIS format. Hence, this EIS consists of the following documents:

1. A summary of the significant environmental issues and EPA's recommended course of action (see Table III). This is the document you are now reading and was prepared by EPA.

2. A summary of the plan prepared by the Pikes Peak Area Council of Governments entitled "Areawide Water Quality Management Plan for El Paso and Teller Counties," and November 23, 1976, Addendum.

3. A document entitled "Options for the Future: What Do They Mean?" (PPACG, February 27, 1975), which presents the land use alternatives considered in the plan.

4. A report entitled "Environmental Resources Study: Summary Report," prepared by PPACG.

The complete water quality management plan prepared by the PPACG consists of several reports. All of these reports are incorporated by reference as part of the EIS and should be consulted for further detailed information. Complete copies of the plan (including all volumes) are available for public use at the EPA Region VIII Library, 1860 Lincoln Street, Denver, and at the offices of the Pikes Peak Area Council of Governments, 27 East Vermijo Street, Colorado Springs. The water quality management plan consists of more than seventy reports, working papers, etc. The most important documents for the purposes of this summary are itemized in Table I.

Other documents that EPA has used in its evaluation of the plan are listed below:

- Preliminary Evaluation of Water Quality of Proposed Fountain Lake, Colorado. U.S. Army Corps of Engineers. November, 1976.
- Stream Segment Analysis (draft report). Pueblo Regional Planning Commission. December, 1976.
- Biological Inventory of Pueblo Waterways. Pueblo Regional Planning Commission. December, 1976.

TABLE I

Documents Incorporated in This EIS by Reference

1) Areawide Water Quality Management Plan for El Paso and Teller Counties. August, 1976

2) Addendum to the Areawide Water Quality Management Plan for Teller and El Paso Counties. November 23, 1976

3) Options for the Future: What Do They Mean? February 27, 1975

4) Environmental Resources Study for Teller and El Paso Counties, Colorado. 1974

Part A.	Perspective
Part B.	Geology
Part C.	Vegetation
Part D.	Wildlife Hazard
Part E.	Wildlife Appendices
Part F.	Visual Resources
Part G.	Climate and Design
Part H.	Environmental Hazards, Constraints, and Limitations

5) Year 2000 Air Quality in the Pikes Peak Region. April 12, 1976

6) Recommendations for Stream Classifications - Fountain/Monument Subbasin (Including Results of Aquatic Sampling). August, 1975.

7) An Evaluation of Waste Treatment Regulatory Practices.

8) Comments on Draft Plan and Responses.

9) Water Quality Management Plan for Stratmoor Hills Sanitation District. August, 1976.

10) Facility Plan for Wastewater Reuse Applications in the Town of Calhan, El Paso County, Colorado. July, 1976

11) Security Sanitation District Facilities Plan. July, 1976

12) Fountain-Widefield Wastewater Study. September, 1976

13) Solids Residuals Plan. August, 1976

14) Wastewater Facility Study for Victor and Cripple Creek, Colorado. September, 1976

15) Wastewater Facility Plan for Florissant and Divide, Colorado. September, 1976

16) Facility Plan for Wastewater Reuse Applications in the Upper Monument Creek Area, El Paso County, Colorado. September, 1976

17) Alternative Population and Employment Forecasts, El Paso County 1980-2000, Detail Report. 1976

18) An Evaluation of Alternative Wastewater Management Systems - Constraints and Opportunities. December, 1975

Pikes Peak Area Council of Governments Action

In May of 1974 the Pikes Peak Area Council of Governments was designated a water quality management planning agency by the Governor of Colorado and provided $955,000 in EPA Section 208 planning funds to develop an areawide water quality management plan for El Paso and Teller Counties. The two-year project was given the name Project Aquarius. The planning effort involved extensive technical analyses and public involvement, and it resulted in several recommendations for water quality management. The major recommendations of the plan are summarized below, and the planning documents which are incorporated in this document by reference are cited in Table I.

1) The plan recommends that a total of $82,022,000 (1976 dollars) be spent to construct municipal wastewater treatment facilities and improvements through the year 2000. Of this amount, $32,052,000 are needed in order to meet the 1983 water quality goals identified in Table 3 of the November 23, 1976, Addendum to the plan (pages 15-16). (For a detailed discussion of these wastewater treatment needs see Chapter VI, pages 177-227, and pages 300-301 of the main report: "Areawide Water Quality Management Plan for El Paso and Teller Counties." These needs are also discussed in the November 23, 1976, Addendum to the plan.)

2) The plan recommends changes in the majority of the present State stream classifications in the two-county area. The most significant change is for Fountain Creek from its confluence with Monument Creek to the El Paso County line. For this stream segment, the plan recommends exemption from the chlorine residual and unionized ammonia limitations required by the present classification of the stream for fish life. The recommendation is based on the plan's conclusion that habitat conditions in this reach of Fountain Creek are not suitable for aquatic life because of natural conditions and low flows due to diversions for agricultural and municipal uses. (Further discussion of this subject is contained in: (1) Chapter IV, pages 155-176 of "Areawide Water Quality Management Plan for El Paso and Teller Counties;" (2) Table 3, pages 15-16, of the November 23, 1976, Addendum to the plan; and (3) "Recommendations for Stream Classification and Results of Aquatic Sampling - Fountain/Monument Subbasin.")

3) The plan recommends designation of six point source management agencies to carry out the function of Section 208 (c)(2) of the Act and recommends agencies for designation in other functional aspects of water quality management. The point source management agencies or associations are consolidations of several existing local entities based on general hydrologic subbasins in the two-county area. (The agencies are identified and the recommendations are discussed in greater detail in Chapter III, pages 124-139, and Chapter VIII, pages 235-241 of the "Areawide Water Quality Management Plan for El Paso and Teller Counties.")

4) The water quality management plan concludes that water quality problems resulting from silviculture, mining, agriculture, and construction are not significant in Teller and El Paso Counties. The plan recommends that nonstructural "best management practices" be implemented to control pollution resulting from urban runoff and septic tanks. (These conclusions are discussed in more detail in Chapter II, pages 54-76, and Chapter VII, pages 229-234 of the "Areawide Water Quality Management Plan for El Paso and Teller Counties.")

Other recommendations and conclusions of the plan are summarized in Table II of this report.

Throughout the two-year plan development period, the PPACG staff conducted an extensive public participation program. Highlights of this program were three all-day workshops, which were scheduled at key decision points during the 208 project. These workshops were well attended by elected officials, public officials, and other interest groups. A similar series of thirteen neighborhood meetings was held during the month of March, 1975, to consider the impacts of the land use and growth alternatives that were proposed for use in Project Aquarius. In addition to the workshops and neighborhood meetings, three local and one state advisory groups were formed to advise the 208 staff on technical and policy issues. Twenty letters commenting on the draft plan were received by the PPACG (see Appendix A).

TABLE II

Recommendations and Conclusions of the Water Quality Management Plan for El Paso and Teller Counties

The following table summarizes the recommendations and conclusions of the 208 plan. The reference after each item refers to the documents listed in Table I of this EIS.

1. Finalize the formation of point source management agencies (Reference 1, pages 235 - 236).
2. Implement the plan's recommended stream classifications and criteria (Reference 1, pages 172 - 176, 290).
3. Change the State's criteria for setting priorities for construction grant funds (Reference 1, pages 219 - 220, 282 - 291, 300 - 301).
4. State should adopt plan's recommendations for permits (Reference 1, page 224).
5. National Pollution Discharge Elimination System (NPDES) permits should specify a fecal coliform limitation consistent with A or B stream classification requirements (Reference 1, pages 170, 176, 186, 189, 297).
6. Local review and evaluation of all newly issued and reissued permits (Reference 1, page 290).
7. Colorado Springs dispose of sludge at Hanna Ranch site and seek related improvements at the Las Vegas Street wastewater treatment plant (Reference 1, pages 224 - 225 and Solid Residuals Plan, PPACG, August 1976).
8. General purpose governments adopt the "Stormwater Criteria Manual" (Reference 1, page 296).
9. State should develop a stormwater policy (Reference 1, page 232).
10. Local entities should improve stormwater housekeeping practices (Reference 1, page 233).
11. State should update list of "Identified Areas" not suitable for septic systems (Reference 1, page 286).
12. City/County Health Department should modify existing septic tank regulations to include a 5 year permit and also institute a post-installation inspection program (Reference 1, pages 286, 294, 296).
13. Expand the City/County Health Department's staff to include a sanitary engineer for purpose of reviewing adequacy of wastewater design during subdivision review (Reference 1, page 296).

14. Transfer responsibility for compliance monitoring from the State to the City/County Health Department (Reference 1, page 290).

15. Counties and cities should amend building codes and subdivision regulations to include water quality component for subdivision reviews including requirements for building moratoriums if facilities are at 90% capacity (Reference 1, pages 292, 294).

16. General purpose government should adopt grading ordinances (Reference 1, pages 74, 297).

17. Water Quality Advisory Committee should develop a budget and a means of payment for the local share of continuing 208 planning (Reference 1, page 270).

18. State should contract with City/County Health Department for monitoring and laboratory services (Reference 1, page 293).

19. State/locals should continue monitoring of ambient stream quality, wells and septic tanks (Reference 1, pages 75, 232, 243, 293, 296).

20. Colorado Springs should amend contracts and building codes requirements to comply with EPA pretreatment, user charge, and industrial cost recovery regulations (Reference 1, pages 268, 293).

21. PPACG should obtain ratification of plan as an element of local comprehensive plans and capital improvements budget (Reference 1, pages 299, 370).

22. State should define "significant discharger" for variety of nonpoint source categories (Reference 1, page 294).

23. State should modify NPDES self-monitoring requirements for smaller communities (Reference 1, page 297).

24. Counties should develop and issue guidelines (regulations) for controlling the proliferation of new special districts (Reference 1, page 291).

25. Copies of NPDES self-monitoring reports should be sent to the 208 planning agency (Reference 1, page 293).

26. Codification of all Colorado Revised Statutes and Regulations pertaining to water pollution control (Reference 1, page 290).

27. State should rewrite solid waste regulations to eliminate conflicts with local regulations and provide better definition of roles between the two levels of government (Reference 1, page 295).

28. State should revise guidelines and regulations pertinent to evaporative lagoons (Reference 1, page 295).

29. State should develop agricultural Best Management Practices (Reference 1, page 292).

30. Funding sources for the development of individual farm management practices plans are recommended (Reference 1, page 292).

31. U. S. Forest Service should increase funding for maintaining recreational forests (Reference 1, page 232).

32. Pikes Peak Forest District should develop solution to lack of sanitary facilities on hiking trails (Reference 1, pages 66, 232).

33. HB 1041 should be used to designate mining impact areas as areas of State interest. Develop appropriate regulations and require permits to be issued by counties (Reference 1, pages 292 - 293).

34. The State should modify the proposed "Rules for the Disposal of Mine, Mill, and Mineral Processing Wastes" to include A-95 review of all applications received by the State (Reference 1, page 295).

35. State should assume responsibilitiy for planning/enforcement activities relative to orphan and active mines, as well as future mining. (Reference 1, page 296).

36. Municipalities and Districts should review rate structures for nonpotable wastewater (Reference 1, page 270).

37. EPA should fund wastewater re-use schemes (Reference 1, page 227).

38. Locals should re-use wastewater for landscape irrigation and industrial purposes (Reference 1, pages 226 - 227).

39. Soil Conservation Districts should be included in review of proposed subdivisions and included as members of the Pikes Peak 208 Water Quality Advisory Committee (Reference 1, page 231).

40. General purpose government should encourage growth in those areas where service already exists (Reference 1, page 291).

State of Colorado Action

EPA's regulations governing the water quality management planning process require that areawide 208 plans be submitted to the Governor for review and certification (40 CFR Part 131.20). On August 5, 1976, the Pikes Peak Area Council of Governments submitted their plan to the Governor for review and certification. On February 7, 1977, after careful review of the plan by State agencies and advisory groups with an interest in water quality management, the State conditionally certified that the plan was consistent with 40 CFR Part 131, the regulations governing the preparation and content of water quality management plans, and that the plan could adequately serve as the State's official water quality management plan for El Paso and Teller Counties. This certification was conditioned on resolution of ten issues that were raised during the State review process. These conditions are summarized below:

1) Stream Classification. The State agreed to the exception requested by the plan only for the segment of Fountain Creek below the Colorado Springs wastewater treatment plant. The State's position on the upper part of the stream segment (i.e., Fountain Creek from its confluence with Monument Creek down to the Colorado Springs wastewater treatment plant) is that it should remain classified for fisheries and that the present water quality criteria should remain in effect. (Under Colorado's water quality statutes only the Water Quality Control Commission has the authority to change stream classifications and water quality criteria, and all such changes must be submitted to a public review process, including formal hearings. Because of these legal requirements, the Water Quality Control Commission must act to fulfill this condition.)

2) Sludge Handling Facilities. Recognizing that sludge disposal at the Colorado Springs wastewater treatment plant is one of the most serious and immediate point source problems in the two-county area and a major contributing factor in the need for stream classification and water quality criteria exceptions, the State conditioned certification of the 208 plan on improved sludge handling receiving highest priority action on the part of EPA, the State, and the local water quality management agency. The 208 plan's recommendations for sludge disposal include immediate upgrading of the sludge handling facility at the Colorado Springs wastewater treatment plant and future land disposal at the Hanna Ranch site. At Hanna Ranch, the sludge would be used for growing agricultural crops and generating electric power at the R. D. Nixon power plant, which is under construction.

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3) Effluent Monitoring. Following completion of the sludge handling facilities discussed above, the State desires that a two-year effluent monitoring program be initiated at the Colorado Springs wastewater treatment plant in order to determine whether or not better than secondary treatment is needed in order to meet water quality goals in Fountain Creek. As long as the problem of sludge disposal at this facility continues, the need for advanced wastewater treatment cannot be evaluated. The principal source of the necessary data would be the self-monitoring program required under the present National Pollution Discharge Elimination System (NPDES) permit.

4) Stream Monitoring. Following completion of the sludge handling facilities discussed in Condition #2, the State also desires a two-year stream monitoring program to gather the data needed in order to evaluate stream conditions and form a basis for making decisions on long-term water quality goals for Fountain Creek and the need for advanced treatment at the Colorado Springs facility. The monitoring program will be a joint state/local effort and will concentrate on stream conditions during biologically critical times of the year.

5) Re-evaluation of Stream Classification and Water Quality Criteria Exceptions. Pursuant to the proposed "Water Quality Standards for Colorado" and EPA regulations on water quality standards revisions (40 CFR Part 130; see also Chapter 5 of the State Water Quality Management Handbook), the State will require a schedule for re-evaluating all exceptions recommended by the plan. This condition requires that the re-evaluation be aimed at upgrading or restoring water quality in Lower Fountain Creek to the extent that it is technically and economically feasible, rather than relying on continued criteria exceptions.

6) State Action on Stream Classifications and Water Quality Criteria. This condition identifies the factors that the Water Quality Control Commission will consider in their decisions regarding recommended changes in stream classifications and water quality criteria. They are:

   a) Recommendations of the 208 plan;

   b) Testimony presented at public hearings;

   c) Recommendations and requirements of the 208 plans for adjoining regions; and

   d) Requirements of appropriate Federal laws and regulations.

7) Priorities for Construction Grants. This condition specifies that the wastewater treatment facility priorities recommended in the 208 plan for using EPA grant funds to construct wastewater treatment facilities will be considered by the State Water Quality Control Commission in carrying out its authority to set priorities for such grants throughout the state.

8) Population Projections. The State conditionally certified the 208 plan pending resolution of differences between the State's growth projections for the two-county area and the projections used in formulating the plan. This condition calls for a resolution of the technical and policy differences on population growth and development of mutually acceptable growth projections within one year. In the meantime, the design capacities of wastewater treatment facilities submitted for grants assistance will be scrutinized for compatibility with State growth policies and projections.

9) Management Agency for Upper Fountain Subbasin. The State rejected the 208 plan's recommendation that both El Paso County and Green Mountain Falls be designated as point source management agencies for the Upper Fountain Creek Subbasin. This condition requires that a single agency be recommended for designation within one year.

10) Local Ratification of 208 Plan. The state conditioned its certification of the plan on presentation of the plan to the appropriate local units of general purpose government for ratification as an element of their respective comprehensive plans. This action is to be completed within six months of EPA's approval of the plan.

In the State's conditional certification of this plan, the Governor also designated five of the six point source management agencies recommended in the plan (see condition #9) and designated the Pikes Peak Area Council of Governments as the continuing water quality management planning agency for El Paso and Teller Counties. The State did not specifically designate management agencies for land use review and nonpoint sources; thus, the current situation will continue with general purpose government exercising control over these sources.

EPA Action

EPA's approach to review and approval of water quality management plans stems from the Agency's regulations, 40 CFR Part 131.21. Under these regulations EPA has three options:

1. Plan approval, or certification that the elements required of a 208 plan pursuant to 40 CFR Part 131.11(a) - (p) have been fully satisified and no more work is needed to complete the plan;

2. Conditional approval, which amounts to a determination that the requirements of 40 CFR Part 131.11 (a) - (p) have not been fully satisfied, and identifies the steps that the planning agency must take in order to achieve full approval if its plan; and

3. Disapproval, or a determination that the agency has not and will not satisfy the requirements of EPA's regulations on plan content or the conditions of the approved work plan.

The significance of 208 plan approval lies in the fact that Congress created the 208 planning process to be the primary mechanism for (1) identifying treatment needs and establishing priorities for Federal assistance in the construction of wastewater treatment facilities, (2) developing the institutional and financial arrangements needed in order to meet the water quality goals of the Federal Water Pollution Control Act, and (3) controlling pollution that arises from dispersed, or non-point sources. Section 208 of the Act prohibits EPA from making grants for construction of publicly owned treatment works to management agencies that are not approved and designated pursuant to the 208 plan; no EPA grants for publicly owned treatment works may be made for projects that do not comply with the plan; and no National Pollutant Discharge Elimination System (NPDES) permits may be issued if they are in conflict with the plan.

EPA has determined that its decision regarding approval, conditional approval, or disapproval of this 208 plan constitutes a major Federal action that falls in the category of actions subject to review under Section 102(2)(c) of the National Environmental Policy Act. Furthermore, EPA has determined that the 208 plan for El Paso and Teller Counties meets the criteria for mandatory preparation of an environmental impact statement pursuant to EPA regulations for the preparation of environmental impact statements (40 CFR Part 6.510). Approval of the plan may contribute to significant changes in land use and patterns of growth; it may have adverse effects on parklands, open space, and lands of significant recreational, scenic, archaeological and historic value; and it may directly or indirectly have an adverse effect on local ambient air quality, local ambient noise levels, and the amount and quality of both surface and subsurface water resources. Thus, this EIS is being prepared and circulated for review in order to focus on the significant issues raised by the plan and provide an opportunity for public comment before EPA makes its final decision on plan approval.

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The PPACG was one of the first agencies in the country (May, 1974) to be designated by a State to prepare a 208 plan in accordance with the Federal Water Pollution Control Act. The PPACG developed the 208 study over the two-year period in accordance with a "work plan" which EPA approved at the beginning of the planning process. EPA has determined that the 208 plan submitted by the PPACG does fulfill the grant obligation as identified in the "work plan."

The PPACG planning process was well underway by the time the EPA regulations (40 CFR Part 131, dated November 28, 1975) for the 208 program were finalized. As a result, neither the "work plan" nor the final 208 plan submitted by the PPACG completely reflected all of the requirements of the EPA regulations. EPA has reviewed the 208 plan to determine how well the plan complies with the requirements specified in the EPA regulations (40 CFR Part 131). However, EPA has used a reasonable, rather than a strict, application of the regulations in view of the discrepancy between the time the plan was initiated and finalization of the EPA regulations.

Issues related to the Water Quality Management Plan for El Paso and Teller Counties are presented in Table III. This table summarizes the issues; presents the proposed EPA action for each issue; and outlines the rationale for the proposed EPA action. EPA will, by reference, include in its approval all the conditions enumerated in the State's certification letter (see prior discussion under "State Action" for details of the State's conditions). Elements of the plan which EPA proposes to approve are:

1. Planning boundaries (40 CFR 131.11(a))
2. Point source inventories (40 CFR 131.11(c))
3. Industrial waste treatment needs (40 CFR 131.11 (i))
4. Residual waste control needs (40 CFR 131.11(k))
5. Urban and industrial stormwater system needs (for developing areas only) (40 CFR 131.11(l))
6. Management agencies (for point sources only as designated by the State) (40 CFR 131.11(o))

The PPACG will be developing a new work plan to continue the planning and implementation activities specified in the 208 plan. This work plan will be submitted to EPA and the State for approval. Frequent reference is made to this new work plan in Table III. It is EPA's intent to use the work plan as the basis for PPACG receiving continuing 208 funding.

TABLE III

Issues Related to the Water Quality Management Plan for El Paso and Teller Counties

Statement of the Issue	EPA's Recommended Action and Rationale
A. The plan recommends and the State has granted temporary exceptions for un-ionized ammonia (NH_3) and chlorine residual for municipal effluents in a segment of Fountain Creek below the Colorado Springs wastewater treatment plant discharge. Included in this exception is a lowering of the instream dissolved oxygen standards from 5 mg/l to 4 mg/l. The Pueblo 208 agency, their advisory committee, the Pueblo Planning Commission and Council of Governments, the Fountain Creek Commission, and the Colorado Open Space Council have all objected to these exceptions based on their possible effect on the proposed Corps of Engineer's Fountain Creek Reservoir, in particular and Fountain Creek, in general.	EPA's Recommended Action: 1. Conditionally approve the 208 plan by accepting the State's Condition Number 6. Also request that the State Water Quality Control Commission (WQCC) give Fountain Creek a high priority for reclassification. 2. If Fountain Creek is reclassified require a re-evaluation within three (3) years as mandated by EPA regulations. Rationale: 1. The objective of 208 as conveyed to PPACG by EPA was to evaluate the attainability of the 1983 fishery and body contact goals as set forth in the Federal Water Pollution Control Act. Attainability was defined as attainment of both water quality suitable for the specified use, as well as attaining the use. 2. Based on the above criteria PPACG, after sufficient investigation, concluded that although water quality could be attained for a fishery, the actual use of the stream as a fishery could not be attained. This is the basis for PPACG requesting the exceptions. 3. EPA requires by regulation that all exceptions be re-evaluated every three (3) years. 4. The report: "Preliminary Evaluation of Water Quality of Proposed Fountain Lake, Colorado" prepared by the U. S. Army Corps of Engineers concludes that nutrients, mercury, and coliform are the only potential water quality problems associated with the proposed reser-

voir. A letter has been sent to the Corps requesting clarification on the affects these exceptions will have on the proposed reservoir.

5. The draft report: "Stream Segment Analysis" prepared by the Pueblo Regional Planning Commission (PRPC) indicates that from a water quality viewpoint the Fountain Creek in Pueblo County has sufficient quality to support a fishery although the water quality data show several parameters exceeding the recommended criteria for aquatic life (e.g. un-ionized ammonia, arsenic, mercury, cadmium, lead, TDS, and TSS).

6. The final report "Biological Inventory of Pueblo Waterways", December 1, 1976, prepared by Southern Colorado University for PRPC concludes that Fountain Creek could not support a fishery due to a lack of suitable habitat and food supply. This report recommends that Fountain Creek be used as an agricultural stream.

7. The Water Quality Control Commission has the responsibility to reclassify the streams of the State. No official action has been taken by the WQCC to reclassify lower Fountain Creek from B_2 to A_2-C as recommended by the plan.

B. The report "Year 2000 Air Quality in the Pikes Peak Region" indicates that the EPA primary standards for three (3) hour hydrocarbon and twenty-four (24) hour particulates will be violated if the population growth projections used by the PPACG are realized. Increased degradation would be likely for NO_x and SO_2. EPA policy states that a 208 plan cannot be approved if its implementation will

EPA Recommended Action:

1. EPA will not participate in the funding of any construction (Step 3) of wastewater treatment plant expansions in the affected air quality areas until the air quality studies are completed. This would affect Fountain (priority 145) and Security (priority 164) as they are due for expansion; but they are not high enough on the State's priority list to receive EPA funds during this fiscal year.

Note: The Air Quality Maintenance Area consists of El Paso County only.

result in air quality standards violations. The issue is one of growth (i.e. to what extent would the 208 plan, particularly the provision for expanded sewerage service, contribute to this growth). Air quality modeling efforts in other metropolitan areas have concluded that the actual on-ground location of this growth is not the critical factor in air quality degradation but that total size of the growth and resultant population is the determining factor. The understanding of the causes of air quality problems in Colorado Springs will be expanded by the completion of the Air Quality Maintenance Plan in 1978 and 1979.

2. The sewerage system expansion aspects of the 208 plan would be conditionally approved pending the results of the air quality studies. These studies may result in revisions to the size of sewage plant expansion and in other mitigating measures aimed at air quality protection.

Rationale:

1. The Pikes Peak area has been designated as an Air Quality Maintenance Area (AQMA) for which an Air Quality Maintenance Plan (AQMP) for particulates is to be prepared. The AQMP is scheduled for completion during the summer of 1978, and will evaluate the effects of the proposed growth (550,000 by year 2000) on air quality, also.

2. The number of data points used to prepare the Year 2000 Air Quality Report and recent advances in air quality modeling may require major modifications of the work done to date. Modeling to date shows a continued worsening of particulate air quality through 1986. This situation can be expected to continue beyond 1985 if mitigating measures are not implemented.

3. Discussions are being held with PPACG to develop a "Transportation Control Plan."

4. EPA has drafted for publication in the Federal Register a request that the State Implementation Plan for Colorado Springs be revised for carbon monoxide. An AQMP for carbon monoxide will be due in January 1979.

5. The significant wastewater treatment plants scheduled for expansion are Security and Fountain. Neither community has a high priority for receiving EPA grant funds on the State's list (priority numbers 164, 145 respectively).

6. Conclusion: EPA is not certain whether the existing and proposed population will result in air quality violations if appropriate mitigating measures are implemented.

C. The Colorado Division of Planning has projected year 2000 population projections ranging from 397,000 to 484.852 for the 208 study area including Park County. This compares to the plan's projection of 573,000 for the two county area excluding Park County. Total population growth and its on-the-ground location is critical to the future environmental quality of the area.

EPA's Recommended Action:

1. EPA will conditionally approve the 208 plan based upon a resolution of the differences between the two population forecasts and on acceptance of State condition #8.

Rationale:

1. Population forecasts are the basis for projecting wastewater treatment facility needs and related water quality impacts. Provision of sewerage facilities may be related to population growth. Growth in total population is critical to maintenance of air quality. The actual location of this population in the area is critical to the protection of flood-plains and unique ecological and scenic resources; cost of public services; protection of neighborhoods; and control of non-point (erosion and sedimentation) sources of water pollution.

D. Comments were received on the plan alleging that implementation of the Pikes Peak plan would result in groundwater degradation in the Security-Fountain water supply aquifers. Also, some of the comments stated that these communities have nitrate levels exceeding the recommended drinking water standards.

EPA's Recommended Action:

1. Approve this part of the plan relying on future studies and plan updates to resolve this issue.

Rationale:

1. The data used in the 208 study do not show increased degradation in these groundwater aquifers, nor do they show any nitrate problems.

2. More recent data are being collected by the U. S. Geological Survey (USGS) at several well sites throughout this aquifer. This work is part of a five party contract with the USGS and is due for completion in summer, 1977.

E. Nonpoint Sources

1. Priority sources

a. Urban Stormwater - the plan states that not enough data were collected to require structural controls or conclude that stormwater is a significant water quality problem. The plan did develop an Urban Stormwater Criteria Manual which includes Best Management Practices for stormwater control.

EPA's Recommended Action:

1. Approve the Urban Stormwater Criteria Manual for use where possible (e.g. Colorado Springs).

2. Suggest modification/simplification of the "Manual" for use by smaller communities as part of the plan update, subject to availability of additional 208 funds from EPA.

Rationale:

1. Colorado Springs Department of Public Works and the El Paso County Department of Transportation have accepted the Urban Drainage Criteria Manual for use in drainage design and subdivision reviews.

2. Studies elsewhere show that tracing the source of urban stormwater problems is expensive and may not be a worthwhile effort.

3. Require reassessment of monitoring needs and the possibility of including compliance monitoring in the "manual" or other regulations.

b. Septic Tanks - the plan states that water quality standards violations have been measured in the Ute Pass area for fecal and total coliform. There is disagreement between the homeowners and the 208 as to the cause of this problem (i.e., overland runoff from horse corrals versus septic tank leaching). The recent position of the 208 agency is that the septic tank situation in Ute Pass is not a significant problem. The 208 would rely on the proposed 5-year permit program to control the problem.

EPA's Recommended Action:

1. Approve the plan using the results of most recent sampling as part of plan updates.

2. If State agrees with sampling results, request from the State a certification that septic tanks in Ute Pass are not a problem.

3. Require in the work plan for continuing funding the details of implementing the 5-year permit program for septic tanks.

Rationale:

1. Recent information from the 208 agency indicates that the water quality standards violations are not frequent and septic tanks in Ute Pass may not be a significant problem.

2. The proposed controls (i.e. 5 year permit which is reissued only after providing adequate evidence that the septic tank system has been properly maintained) may mitigate the problem. If the problem is not mitigated, other controls will need to be considered.

2. Non Priority Sources

a. Silviculture - the plan indicates that minimum harvesting of forests occurs in the study area and that the major forest activity is recreation. The plan also states that the Forest Service has adequate Best Management Practices to control water quality problems resulting from recreational use of the forests; however, funding and manpower prevent their proper implementation.

b. Agriculture - during two years of sampling of agricultural return flows, measured at a chosen site on a major irrigation ditch draining into Fountain Creek, no problems were found. The plan did not inventory the percentage of agricultural activities presently implementing agricultural BMP's.

c. Construction - only one community has grading ordinances and the plan recommends that the other communities develop and adopt such regulations. Many of the construction activities relate to new subdivision development for which the "Urban Stormwater Criteria Manual" provides guidance and control.

d. Mining - the 208 planning effort resulted in the conclusion that mining is not a significant water quality problem at this time.

EPA's Recommended Action:

1. EPA will not fund any further work in these categories unless a need is shown.

2. EPA will approve these portions of the plan upon receipt from the State, certification that they are not problems.

3. EPA will require as part of the work plan, provisions for implementing the grading ordinances in conjunction with the Stormwater Criteria Manual.

4. The Statewide 208 (208 planning for all of Colorado not designated as "Areawide" 208 - conducted by the State) is reviewing abandoned mine drainage problems.

Rationale:

1. If these non point sources are determined not to be a water quality problem, then EPA should not expend further funds to study them.

F. The State did not designate a management agency for any of the non-point source categories. The State did not designate a point source management agency for the Upper Fountain Sub-basin (Ute Pass). EPA regulations require designation of management agencies for point and non-point source problems unless the State certifies that a problem does not exist.

EPA's Recommended Action:

1. Conditionally approve the State's certification and the 208 plan contingent on PPACG preparing a summary of who is expected to implement the recommendations outlined in Table II. This summary would be required as part of the documentation prior to plan adoption by local government and as required by the State's condition number 10.

Rationale:

1. Further study of the Ute Pass (Upper Fountain) area septic tank situation is underway. The designation of the final management agency will depend upon the outcome of this study.

2. The timing of the designation of agencies for non-point source control is dependent upon the development of State policy for non-point pollution and on development of implementation programs at the local level.

G. For non-point source pollution, the plan indicates that regulatory programs are inadequate or lacking. The plan makes several recommendations regarding these programs but did not develop any regulations, etc. which would correct the deficiencies. Also, the plan makes several other recommendations (See Table II) but does not identify, in many cases, who is responsible for implementing them.

EPA's Recommended Action:

1. Conditionally approve the recommendations made in Table II contingent on development of the summary document referred to in "F" above and preparation of a detailed work plan which outlines future 208 activities in this area.

Rationale:

1. It is EPA's policy to require as much as possible in terms of developing and implementing these regulations, etc. This EPA policy was established after the 208 plan was well underway.

2. The PPACG did not have the benefit of this EPA policy guidance in time to affect the outcome of their program.

H. Teller County is presently not a member of the Pikes Peak Area Council of Governments. The plan calls for Teller County's participation in implementing point and non-point source programs.

EPA's Recommended Action:

1. None.

Rationale:

1. El Paso County has rejoined the PPACG and Park County is considering doing the same.

2. Plan implementation is not necessarily tied to PPACG membership; to wit, special districts.

3. A resolution was obtained from Teller County at the initiation of the 208 effort indicating their willingness to make 208 a successful program.

I. Some local government agencies and special districts have not yet signed the agreement to become a member of the management association. Therefore, all wastewater operating agencies are not represented by a management agency, which could jeopardize their receiving EPA wastewater treatment grants.

EPA's Recommended Action:

1. Approve the agencies as designated and require the work plan, that will be developed, to outline PPACG's efforts in solidifying and finalizing these agencies, as a high priority.

Rationale:

1. All the management associations have been formed and have participating members.

2. The State has designated these entities as the point source management agencies.

3. Acceptance of the State's designation will encourage stragglers to sign the agreement.

J. The 208 plan includes eight proposed wastewater treatment facility plans. EPA grants for wastewater treatment facilities are normally awarded in three steps.

EPA's Recommended Action:

1. Approve the 208 plan, but not the eight facility plans as Step I documents. Each facility plan will need to obtain a se-

Step I is for development of a facility plan. Step II is for detailed facility design. Step III is for actual facility construction. The Step I facility plan must be approved before a Step II design grant can be awarded. In this case, does State certification and/or EPA approval of the 208 plan constitute Step I approval of the eight wastewater treatment facility plans included in the 208 plan?

parate approval as a Step I Plan. Approval of the 208 plan would include those conditions cited elsewhere related to treatment levels and design capacities (e.g. resolution of population difference, adoption of stream classifications, etc.)

2. Complete review of the four outstanding facility plans.

Rationale:

1. EPA guidance states that facility plans prepared under 208 will not constitute Step I plans.

2. The eight facility plans were prepared by PPACG knowing that they are deficient as Step I plans.

3. Comments have been prepared by EPA on four of the eight facility plans identifying the deficiencies. These comments were forwarded to the PPACG.

K. The City of Colorado Springs had many problems with treating and disposing of its sludge using the porteous process. In addition, alleged discharges of sludge directly into Fountain Creek are currently being investigated. These allegations, however, were made after the completion of Project Aquarius and, as such, are not addressed in the 208 plan.

EPA's Recommended Action:

1. Approve the plan accepting the State's conditions # 2, 3, and 7.

2. If EPA funding will be pursued, response to EPA's questions on the "Solids Residuals Plan" will be needed. The EPA letter is dated February 3, 1977. The State is currently reviewing this plan and their questions will need a response also.

3. EPA supports the 208 plan's emphasis in the timely correction of sludge problems.

4. EPA's enforcement function will continue to follow that situation.

Rationale:

1. Sludge handling at Colorado Springs is the number 1 water quality problem for the area at this time.

2. Step I approval will need to be obtained separate from 208 approval (see J above).

L. The plan makes priority recommendations for using EPA grant funds to meet wastewater treatment needs. These priorities were not derived using the State's priority system. State condition #7 indicates that the plan's priorities will be integrated into the State's priority list. It is not clear how this will be accomplished since both lists were derived using different criteria.

EPA's Recommended Action:

1. Conditionally approve the plan contingent on the State implementing condition #7.

Rationale:

1. Setting priorities for use of EPA construction grant funds is a State function.

M. The plan makes several recommendations related to land use controls as a means to protecting water quality (e.g., develop engineering capability in City/County Health Department to conduct water quality review of subdivision proposals). The plan does not identify specifically who will be responsible for implementing these recommendations or when implementation will occur.

EPA's Recommended Action:

1. Conditionally approve this part of the plan contingent on development of a work plan which delineates the details for attaining plan implementation. Also, EPA would expect a summary to be prepared by PPACG and presented to local government for their ratification. This summary would include the who, what, and when of plan implementation.

Rationale:

1. The PPACG was instructed that 208 was to generate an "implementable plan," not a plan that has been implemented. EPA expects PPACG to present to local government for their adoption as part of satisfying State Condition #10, a summary which identifies the who, what, and when, of plan implementation.

2. Early implementation will continue to be an objective of the 208 program and an expectation of EPA. However, EPA will be realistic and not expect total implementation during the two year planning cycle, especially since the 208 plan covers a 20 year planning period.

Comments on Draft EIS and EPA Responses

Comments on the draft EIS are summarized in Table IV below, together with EPA's responses to each comment. Changes in the draft EIS that were made in response to the comments are identified. All letters of comment received prior to release of this final EIS are reproduced in Appendix C.

Table IV Comments on Draft EIS and EPA responses

Comment	Response
Pikes Peak Area Council of Governments (PPACG)	
1. PPACG did not prioritize the recommendations and conclusions as shown in Table II of the draft EIS.	1. The distinction between high and low priorities has been deleted from Table II and the text of the final EIS.
2. The EIS does not adequately reflect the State's position on the stream classifica-recommended in the plan for lower Fountain Creek.	2. The intent of the EIS was to distinguish between the plan's recommendations and what the State certified for the segment above the Colorado Springs wastewater treatment plant to the confluence of Monument Creek. This has been clarified in the final EIS.
3. PPACG objects to the statement in the draft EIS regarding alleged discharge of sludge by the Colorado Springs wastewater treatment plant into Fountain Creek.	3. The reference to alleged sludge discharges has been modified in the final EIS.
4. The lack of formal designation of non-point source management and land use review agencies by the State does not imply that these agencies do not exist.	4. EPA's statement at the bottom of page 13 of the draft EIS does not imply that agencies with responsibilities in the areas of non-point sources management and land use review do not exist in the State of Colorado. EPA recognizes that agencies with these authorities do exist, however we believe that formal designation of these agencies as entities responsible for protecting, and, where necessary, improving the quality of Colorado's water is desirable.

Table IV. Comments on Draft EIS and EPA Responses (cont.)

Comments	Response
PPACG (Cont.)	
5. Withholding sewerage treatment plant construction funds in an attempt to control growth that will result in unacceptable deterioration of air quality places an unjust burden on water quality and will not lead to achievement of water quality goals. Further, the Air Quality Maintenance Area (AQMA) of concern consists only of El Paso County.	5. The statement on page 18 arises from the observation that the availability of urban services, such as wastewater treatment, can greatly influence the speed and direction of urban growth. To induce growth that would adversely impact air quality by using EPA funds to provide these services would be in violation of EPA's regulations and policies against solving one environmental problem while creating another. The recommended restrictions on EPA funding of sewerage treatment facilities would only apply in areas where such funding would contribute to air quality problems. The final EIS has been revised to reflect the fact that only El Paso County is included in the Colorado Springs AQMA.
6. Both the Colorado Springs Public Works Department and the El Paso County Transportation Department have adopted the Urban Drainage Criteria Manual.	6. Page 21 of the EIS has been revised to reflect the fact that both agencies have administratively accepted the Manual for use in review of drainage designs and subdivisions.
7. Implementation of the 208 plan depends on the availability of continuing funding from EPA.	7. EPA agrees, however the continuing planning and implementation processes should ultimately become self-sufficient and require no further Federal financial assistance.
State Historical Society of Colorado	
1. The draft EIS does not address historical and archaeological resources. These values should be addressed as early as possible in the planning process, before the range of mitigative alternatives has been reduced by planning decisions.	1. EPA agrees; historic and archaeological resources were not emphasized in the regional water quality management planning process. These values, since they are site specific values, will be addressed in the site specific facility plans and their environmental assessments or environmental impact statements.

Table IV. Comments on Draft EIS and EPA Responses (cont.)

Comment	Response
State Historical Society (Cont.)	Under EPA regulations it is the responsibility of the grantee to assure that cultural resources are protected. EPA is sensitive to the need to protect cultural resources and remains committed to working with historic preservation interests to identify these resources early in the facility planning process and insure that they receive adequate consideration and mitigation during planning and construction. EPA's reviews of the facility plans prepared under the 208 effort reflect this commitment.
U.S. Army Corps of Engineers	
1. The water quality criteria exceptions for unionized ammonia, residential chlorine, and dissolved oxygen could have an adverse effect on water quality and establishment of a warm water fishery in the Corps' proposed Fountain Creek Dam and Reservoir.	1. EPA agrees that further study of these matters is needed, however, the water quality criteria exceptions are not irrevocable or irreversible. Indeed, stream classifications and water quality criteria must, by regulation, be reviewed every three years in order to assure continuous progress towards attaining the water quality goals of PL 92-500. The water quality needs and impacts of the proposed project will be taken into consideration in future reviews and revisions of stream classifications and water quality standards.
U.S. Department of Agriculture, Soil Conservation Service (SCS)	
1. The draft EIS does not contain sufficient information concerning the sites upon which wastewater treatment facilities will be built.	1. Site specific impacts and mitigation measures of individual wastewater treatment plants will be addressed in detail in the environmental assessments and/or environmental impact statements prepared for each individual project.

Table IV. Comments on Draft EIS and EPA Responses (cont.)

Comment	Response
U.S. Department of Agriculture, Soil Conservation Service(SCS) (Cont.)	
2. The final EIS should describe the impacts of the 208 plan on prime and unique farmlands, rare or endangered species, archaeological sites, flood plains and wetlands.	2. Some of these factors were taken into account in identifying areas that are suited for development and those that are not. A more thorough inventory of these resources and analysis of the impacts of the program will, however, follow in the environmental assessments and/or environmental impact statements on the individual wastewater treatment facilities proposed in the plan.
3. The draft EIS does not provide sufficient documentation of the conclusion that "agriculture, mining, and silviculture activities are not now a significant source of pollution (page 75, PPACG 208 Plan)."	3. EPA agrees that the 208 plan does not completely document this conclusion; however, there is sufficient documentation to warrant the conclusions. These categories of pollution sources were not given high priority in the initial 208 plan, however, they may be addressed in more detail in the future as higher priority issues are resolved.
4. SCS suggests that the final EIS address the problem of non-point sources of pollution as it relates to construction activities for wastewater treatment facilities.	4. See response to SCS Comment #1.
U.S. Fish and Wildlife Service (USF&WS)	
1. USF&WS recommends close coordination with the Colorado Division of Wildlife should the plan be implemented.	1. The Colorado Division of Wildlife was represented on a special task force during the study, and EPA hopes that the agency will continue to be involved in the formulation and implementation of water quality management plans.

Table IV. Comments on Draft EIS and EPA Responses (cont.)

Comment	Response
USF&WS (cont.)	
2. USF&WS disagrees with the plan's conclusion that a fishery is not attainbble in lower Fountain Creek, and does not believe that exceptions for unionized ammonia and residual chlorine are justified simply because a fishery does not exist there at the present time. The agency is also concerned about the impacts of these exceptions on water quality further downstream.	2. The present criteria are justified on the basis of the absence of a fishery at the present time, the current status of the stream due to discharges of wastewaters, and depleted flow regimes caused by water diversions. EPA, however, views the periodic review of stream classifications and criteria as an opportunity to continually upgrade these waters toward attainment of the goals of PL 92-500. EPA anticipates that the downstream impacts of the criteria exceptions will be insignificant beyond the El Paso County line.
U.S. Department of Health, Education, and Welfare	
1. The impacts expected from the proposed action and reasonable alternatives thereto appear to have been adequately addressed.	1. Thank you.

Table IV. Comments on Draft EIS and EPA Responses (cont.)

Comment	Response
U.S. Department of Housing and Urban Development	
1. Little effort is made in the draft EIS to show how a water quality management plan will affect growth.	1. EPA believes that the provision of excess sewerage capacity may remove a growth constraint imposed by the present lack of such services. Once this constraint to growth is removed and growth accelerates, the adverse impacts of growth can come into play. This notion is elucidated in some detail in the Council of Environmental Quality publication entitled, "The Growth Shapers: the Land Use Impacts of Infrastructure Investments" (May, 1976).
2. There is no discussion of what could be done to mitigate the adverse effects of projected growth.	2. The section of the EIS entitled EPA Action discusses alternatives that are available to EPA and outlines the rationale behind the recommended course of action. These recommendations, especially as they pertain to conditional approval of elements of the 208 plan and guidance for further planning, are attempts to mitigate the adverse growth-related impacts of the Pikes Peak 208 plan. Further efforts to mitigate these impacts will be made during the facilities planning process.
3. Many of the impacts identified in the draft EIS are not thoroughly discussed.	3. The impacts mentioned in the summary EIS on the 208 plan will be addressed in detail in the individual environmental assessments and environmental impact statements prepared during the planning stages of the wastewater treatment facilities recommended in the plan.

Table IV. Comments on Draft EIS and EPA Responses (cont.)

Comment	Response
State of Colorado	
1. The Colorado Springs area should, as rapidly as possible, develop implementable air pollution reduction and maintenance strategies.	1. EPA agrees.
2. The Air Pollution Control Division is unable to judge the accuracy of the statement on page 19 of the draft EIS that "on ground location of growth is not the critical factor in air quality degradation." The Division would not like to see a 208 plan that completely locks out an alternative population distribution as a potential air pollution reduction strategy.	2. The final EIS has been revised to state that it appears that the location of growth is not the critical factor in air quality degradation. The Air Quality Maintenance Plan for El Paso County will provide a clearer understanding of the air quality situation and the measures that are needed to reduce air pollution and prevent future air pollution standards violations. EPA intends that both programs be coordinated so that the resulting plans are both effective and compatible with one another.
3. The draft EIS presents the State's and EPA's reaction to the proposed 208 plan with little explanation of what the plan for El Paso and Teller Counties looks like or accomplishes.	3. The draft EIS package included a summary document prepared by EPA and the main output of the planning process, the Areawide Water Quality Management Plan for El Paso and Teller Counties, which was prepared by the Pikes Peak Area Council of Governments. The latter document is an integral part of the whole EIS package and, we believe, provides sufficient explanation of the plan to serve as an adequate basis for evaluating the proposed plan and its environmental impacts.
4. The Highway Department would like to see the following concerns addressed in the development of the work programs for the next round of water quality management planning by PPACG:	4. EPA appreciates these positive and very thoughtful suggestions and will encourage that they be given serious consideration in the development of future PPACG water quality management work programs.

Table IV. Comments on Draft EIS and EPA Responses (cont.)

Comment	Response
State of Colorado (cont.)	
4. (Cont.)	
a. Have the Colorado Springs Transportation Improvement Program and the PPACG input to the CDH Five-Year Highway Construction Program been formulated incorporating Project Aquarius objectives?	
b. How does the current Five-Year Construction Program contribute to changes in land use, thereby affecting plans for control of stormwater runoff and for wastewater treatment facilities?	
c. Have the growth-stimulus effects of transportation projects been considered with plans for regionalized or consolidated wastewater treatment?	
d. Who will continuously coordinate planning for transportation and water quality management?	
e. Will the responsibilities of PPACG Transportation Advisory Committee change to reflect the concerns for water quality? If so, what will these new responsibilities include?	
f. Will the Environmental Protection Agency through the PPACG promulgate criteria to be applied during highway project impact assessment studies to ensure consistency between transportation and water quality goals, policies, programs and plans?	

Table IV. Comments on Draft EIS and EPA Responses (cont.)

Comment	Response
State of Colorado (cont.)	
4. (Cont.)	
g. What additional erosion controls and standards for highway project construction, if any, are anticipated by the Environmental Protection Agency, and will potential chemical pollutants such as de-icers, pesticides and herbicides be restricted?	

APPENDIX A

COMMENT LETTERS RECEIVED BY THE
PIKES PEAK AREA COUNCIL OF GOVERNMENTS

1. City of Colorado Springs
2. City of Manitou Springs
3. City of Fountain
4. City of Woodland Park
5. Cimarron Sanitation District
6. Woodmoor Water and Sanitation District
7. Security Water and Sanitation District
8. Widefield Homes Water Company
9. J.H.W. Investment Company
10. Chipita Park Homeowners' Association
11. Colorado Open Space Council
12. U.S. Air Force Academy
13. Colorado Springs, El Paso County, City-County Health Department
14. Teller County Health Services
15. Teller County Planning Department
16. El Paso County Land Use Department
17. League of Women Voters, Pikes Peak Region
18. Fountain Creek Commission
19. Pueblo Regional Planning Commission
20. Mr. James Monaghan, Assistant to the Governor for Natural Resources

CITY OF COLORADO SPRINGS
OFFICE OF THE MAYOR
P. O. BOX 1575 COLORADO 80901

LAWRENCE D. OCHS
MAYOR

TEL. (303) 471-6600

August 3, 1976

Mr. Roland Gow
Assistant Director
Pikes Peak Area Council
of Governments
27 East Vermijo
Colorado Springs, CO 80903

Dear Mr. Gow:

The City of Colorado Springs has reviewed the draft of the Water Quality Management Plan for Teller and El Paso Counties. The City agrees with the basic concepts presented in the draft for management, continued planning, stream standards and facility needs. We are pleased to have cooperated in this major effort to preserve the quality of the area's waters.

Our major concern rests with implementation of the plan. The document presents a realistic approach but without the cooperation of all levels of government and continued construction grants, the timing of specific events will have to change. We must also reserve our decision on the specifics of advanced waste treatment for landscape irrigation and industrial reuse. In general, however, Colorado Springs looks forward to continued cooperation with all entities during the plan implementation phase of Project Aquarius.

Sincerely,

Lawrence D Ochs

Lawrence D. Ochs
Mayor

md

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CITY OF MANITOU SPRINGS

"At the foot of Pikes Peak"

606 MANITOU AVENUE
MANITOU SPRINGS, COLORADO, 80829

July 9, 1976

Mr. Michael J. Meehan
Executive Director, PPACG
27 East Vermijo
Colorado Springs, Colorado 80903

Dear Meehan:

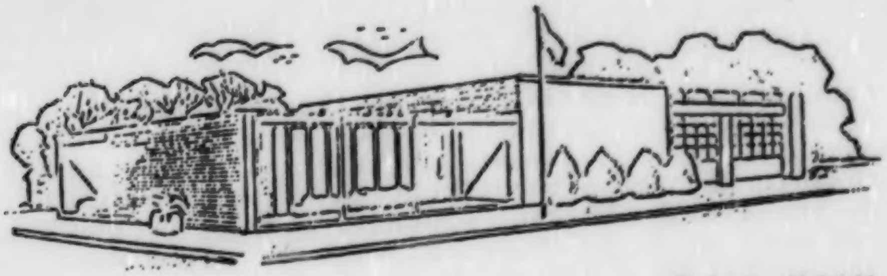
At our City Council meeting of July 6, 1976, we reviewed the draft report on Project Aquarius and asked several questions of Mr. Roland Gow of your staff. After considerable discussion on the report, we were in general agreement with the proposals set forth in it and we are generally, pleased with the A-1 classification for Fountain Creek.

Though this letter does not represent a formal position of the City Council, I wanted to inform you of our feelings toward this extensive work which we feel is exemplary of the purpose of PPACG.

Very truly yours,

George N. Miller
Mayor

jg



City of Fountain FOUNTAIN, COLORADO

116 MAIN STREET
TELEPHONE 382-5604
SIGURD AGA, Mayor

July 13, 1976

Mr. Rowland Gow
Pikes Peak Area Council of Governments
27 E. Vermijo Avenue
Colorado Springs, Colorado

Re: Project Aquarius

Dear Roland,

The City Council of the City of Fountain acted in a regular meeting on July 12, 1976 to strongly endorse the technical standards portion of the final draft report of Project Aquarius. However, the Council members also indicated that they strongly disagreed with the creation and utilization of a technical subcommittee to recommend priorities to the PPACG for the Areawide Plan and its annual udpate, and the Council members asked me to propose an alternative organizational structure to you.

Basically, the concern of the Council is not with the ability of the PPACG elected officials or staff to make effective decisions, rather the concern is primarily with the inherent political instability of the organization. The PPACG was structured to function in a manner which is supposed to be superordinate to the parochial political interests of the members while not infringing upon the rights and authorities of the members. Given an adherence to the regional concept of goals and benefits, the PPACG is better structured than any other agency to utilize the A-95 review process and technical staff to provide an objective evaluation of projects to insure optimum use of funds and resources. It is on these strengths that we would propose to build, while avoiding the negative aspects of the PPACG's weak and unstable political arrangement.

The problem of the instability is reflected in the variable membership of the PPACG. The County of El Paso, as well as other general governments, have not demonstrated either a continued effective presence in the organization or participation based upon regional needs. It is imperative that the governments responsible

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for land use control have a strong role in the decision making process, and, with El Paso County not being an effective member of the PPACG, that is not possible. It is also of utmost criticality that the agencies responsible for the actual treatment of wastewater have a strong voice in the decision making process, and, given the associate member status of most of these entities, that is impossible. The structure of the technical subcommittee would only magnify these inequities and weaknesses, and the lack of proper representation in the voting structure of the PPACG would only serve to exclude a significant number of taxpayers and utility users who are responsible for amortizing the debt service on the various bonded capital improvement in the region from the decision making process.

It was my proposal for an alternate structure that the members of the Council asked me to transmit to you for consideration, and I have attached a preliminary draft of a Joint Exercise of Powers Agreement which was designed for use at the sub-basin level for your convenience. As you will notice, the draft built upon the basis document prepared by the PPACG, and was expanded to deal in greater detail with organizational stability; the authority, responsibility, and accountability of the Joint Board; and a more viable voting structure. I believe that some type of weighted voting which clearly recognizes the comparative capital investments and service obligations of the constituent members is clearly needed. However, I believe that this weighted voting should only be invoked under specific conditions, and then only as a negative check upon the actions of the Joint Board. Final affirmative action would have to be taken by the majority of the voting members. This would protect each member from usurpation by the strongest and largest members, and protect the entities with the greatest commitment in investment from being jeopardized by a coalition of smaller entities.

The draft Agreement is not of course applicable to a superordinate organization as it is currently written. However, the essentials that I see for an agency with the designated responsibility for the preparation and review of the Annual Plan are within the areas mentioned above. I envision a Joint Exercise of Powers Agreement among the sub-basin associations delegating voting representation as provided in paragraph 6 of the attached document, and with the weighted voting as also described. The actual weighting of the vote should be established so as to give the weight to the entities that have actual capital investments in wastewater treatment facilities rather than on the basis of population. The formula can be established upon technical standards without too much difficulty. The sub-basins would have equal representation with the weighted voting designed to address the problem of the larger and small entities.

This Association would be responsible for the areas of concern for the designated planning agency as those areas affect actual decision making in the establishement of construction and funding priorities and in the preparation, review, and update of the annual plan.

The PPACG would provide all technical and staff input and support for the Association. The Association would not control or direct the staff of the PPACG, but coordination would be forced between the Joint Board and the elected officials of the PPACG. The PPACG would retain a strengthed A-95 review authority over the submittal of finding requests.

This function is designed to be a negative over the actions of the Joint Board, and would not grant the PPACG the authority to reallocate priorities. The negative authority would require a reassessment of the proposal, and the goals and objectives of the Joint Board as they relate not only to the Federal Water Pollution Control Act but also to the regional goals and objectives established through the PPACG.

This is essentially the basis of my proposal, and it needs a terrific amount of work and discussion. I would be most happy to discuss it with you at your convenience. If I can provide any additional information, please do not hesitate to contact me. With kindest regards, I am

Very truly yours,

Richard G. Brown
City Manager

RGB/cs

PIKES PEAK AREA COUNCIL OF GOVERNMENTS

PPACG

MICHAEL J. MEEHAN
Executive Director

27 EAST VERMIJO
COLORADO SPRINGS, COLORADO 809
PHONE (303)471-7080

July 29, 1976

Mr. Richard G. Brown
City Manager
116 Main Street
Fountain, Colorado 80917

Dear Dick:

Thank you for your letter of July 13, 1976, reporting the endorsement of the technical portions of Project Aquarius by the Fountain City Council, and your concerns over the PPACG as the designated planning agency.

I reviewed the contents of your letter, as fully as possible, with the PPACG at its regular meeting of July 14, 1976. During discussion, the Council members noted that PPACG was in fact a stronger organization than any of the new water quality management associations; that the question of political stability would be answered outside the water quality management plan; that previous actions, and Workshop III, had endorsed the designation of PPACG as the planning agency; and that if changes in the proposed organization of the committee were necessary then they would be identified and accomplished during the updating process. The result of the discussion was that the recommended designation of PPACG as the planning agency should remain in the plan as proposed.

I realize this does not satisfy your concerns, but if we continue to cooperate, as we have in the Aquarius program, I think any difficulties can be overcome.

Sincerely,

Roland Gow

Roland Gow
Project Director

ka

BEST VIEW OF PIKES PEAK

CITY OF WOODLAND PARK

CLERK-TREASURER
RUE ANN VORHIES

MAYOR
[redacted]
ALVIN E. BORN

CITY MANAGER
GLENN W. BOLSEN

220 W. SOUTH AVE. BOX G WOODLAND PARK, CO 80863 PHONE (303) 687-9243

July 7, 1976

Mr. Rowland Gow, Asst. Director
Pikes Peak Area Council of Gov'ts.
27 East Vermijo
Colorado Springs, CO 80903

Re: Project Aquarius Report

Dear Roland:

This letter is to advise you that the Woodland Park City Council, after complete review of the report submitted, voted unanimously to approve the Project Aquarius "draft" as prepared by you, your office and staff; a job well done.

Sincerely,

Glenn

Glenn W. Bolsen
City Manager

GWB:jw

CIMARRON SANITATION DISTRICT

702 WESTERN DRIVE • COLORADO SPRINGS, COLORADO 80915 • (303) 597-5080

P. O. Box 9908
Colorado Springs, CO 80932

July 9, 1976

Pikes Peak Area Council
of Governments
27 East Vermijo Avenue
Colorado Springs, CO 80903

ATTENTION: Mr. Roland Gow

Dear Mr. Gow:

The Board of Directors of the Cimarron Sanitation District hereby endorse the draft and contents of Project Aquarius as projected on May 26, 1976.

We commend you and your people for an excellent job done in the last few years. We are well aware of a lot of time and effort spent on this project.

Sincerely,

Raymond H Christensen

Charles B. Parker
Chairman/President

Raymond H. Christensen
Director

Ernest L Niemeyer

Thomas J McArdle

Ernest L. Niemeyer
Vice-President

Thomas J. McArdle
Director

J. O. Carmichael

J. O. Carmichael
Secretary-Treasurer

G. N. Free, Jr.
Manager

GNF:dl

WOODMOOR WATER AND SANITATION DISTRICT NO. 1
P. O. BOX 632
MONUMENT, COLORADO 80132

July 9, 1976

Mr. Roland Gow
PPACG
27 E. Vermijo,
Colorado Springs,
Colorado 80903

Dear Roland,

Woodmoor Water and Sanitation District concurs in the Draft Areawide Water Quality Management Plan For El Paso and Teller Counties.

We would like to provide some general comments:

1. We feel that the viewpoints of all were represented. The document discussed the evolution of associations into authoritative agencies on page 148 in the summary. In conclusions on page 158 the sentence, "It is the start of an evolutionary process which can develop as the need arises.", implies to us that this evolution is a foregone conclusion. We submit this is not so, and that evolution beyond the management systems finally defined by Aquarius will take place if rather than "as" necessary. This may seem a small point, but we feel the management systems developed as a result of Aquarius were, by far, it's most important aspect.

2. Direct coordination on financial matters would have been helpful. For example, on page 294, Table IX-5, our 1980 assessed valuation is forecast at 10.35 million. We are now at 8.99 million, and expect to be at about 10 million for 1976. We feel that our 1980 valuation will be closer to 12 million than 10.35.

3. We were impressed with Recommendations for Regulatory Programs as a type of information which could apply to assisting in implementing the current plan of organization as established by Aquarius. We recommend such information be added to the plan before it is dispatched for State approval by the Governor.

4. As a final note, we emphasize again that the PPACG is in our eyes not only the primary planning agency, but is also the primary coordinating agency should this plan be implemented.

Very truly yours,

J.B. Price
Manager

Security Water and Sanitation Districts

231 Security Blvd.
392-3475
Security, Colorado 80911

26 July 1976

Mr. Roland Gow, Project Director
Project Aquarius
Pikes Peak Council of Governments
27 East Vermijo
Colorado Springs, Colorado 80903

Dear Roland:

The Security Water District has long been concerned about degradation of the quality of water in the Widefield Aquifer, which is the source of its municipal water supply.

The Colorado Springs Treatment Plant lies only 3 miles upstream of the Widefield Aquifer. The plant discharges into the No. 4 Ditch and Fountain Creek.

Fountain Creek water recharges the Widefield Aquifer under natural conditions. Artificial direct recharge of the Widefield Aquifer using Fountain Creek water has been practiced for many years by Clear Springs Ranch which is owned by Colorado Springs. Further, the Widefield Aquifer is recharged by seepage from the No. 4 Ditch which carries effluent.

The 208 Plan refers to the Widefield Aquifer and to our 12,000 citizens who are furnished water from the Widefield Aquifer. The 208 Plan does not speak directly to our concern over aquifer water quality, however.

Once the 208 Plan is approved, it is the official water quality plan of the State. Therefore, it is incumbent upon me to bring to your attention that:

1. Nitrate levels have risen in the Widefield Aquifer over the years. During my 1970 monitoring program of municipal water, NO_3 was regularly in excess of 50 mg/l in September, October, and November.

2. Clear Springs municipal water supply NO_3 levels were in the 80 to 100 mg/l range in the fall of 1968, and well above 46 mg/l in 1969.

3. In 1975 and 1976 the Fountain Creek stream quality below the Widefield WTP had a mean of 19.4 mg/l of total ammonia. At Stratmoor, Fountain Creek had a mean total N expressed as NO_3 of 58 mg/l. This is very high nitrogen content for municipal water supply aquifer recharge.

4. Phosphorous in Fountain Creek below Stratmoor has been running at a mean of 3.9 mg/l for 1976. Stream water quality standards should control this at about 1.0 mg/l for municipal water supply classification.

5. In May of 1970 our laboratory measured drinking water from Security Well Numbers 10, 17, 14, 4, and 12 to have ABS levels ranging from 0.5 to 1.2 mg/l. This measuring was done as a result of customer complaints of foaming water from household water faucets.

We have been waiting for a water quality management plan which would lead to a cure of the stream pollution problem. The 208 Plan does not appear to adequately address our Widefield Aquifer water quality questions related to municipal water supply.

In addition to nitrogen, phosphorous and ABS for which we have made tests, questions exist relative to carcinogens, pesticides, virus, various organic compounds and other pollutants which might be identified under the Clean Drinking Water Act enforcement efforts.

As Manager of the Security Water District, I would like to state that I am not at all sure that the 208 Plan will protect our underground municipal water supply aquifer. Yet, once the Plan is adopted, it is the official State plan. At that time it would be too late to do anything about the quality of recharge water.

By copy of this letter to Mr. George Prince of the Colorado Department of Health, I am asking him to advise on monitoring needs and other means to protect our water supply.

Yours very truly,

Thomas K. Remple

Thomas K. Remple, Manager

TKR:jlb
cc: Mr. George Prince

PIKES PEAK AREA COUNCIL OF GOVERNMENTS

PPACG

MICHAEL J. MEEHAN
Executive Director

27 EAST VERMIJO
COLORADO SPRINGS, COLORADO 809
PHONE (303)471-7080

July 29, 1976

Mr. Thomas K. Remple
Manager
Security Water and Sanitation Districts
231 Security Boulevard
Security, Colorado 80911

Dear Tom:

Thank you for your letter of July 26 concerning an alleged lack of concern for the Widefield aquifer in the 208 plant. The Pikes Peak Area Council of Governments fully appreciates the problems with respect to your water supply source and would point out the following:

1. Nitrate levels in the Widefield aquifer have probably risen over the years, but there is little historical data. In 1972 the USGS measured levels of NO_3 in Range 60, Township 15, between 3.1 and 28.4 mg/l. Levels in the Widefield Well No. 4 and Venetucci Well No. 3 (on the basis of only one measurement per well in 1976) indicate levels of 31 and 35 mg/l respectively. No recent measures approach your 1970 levels.

2. Measurements in the Clear Springs Ranch area by the City of Colorado Springs indicate recent NO_3 levels between 24 and 26 mg/l. On July 21, 1976, samples contained a concentration of 18.1 mg/l.

3. Ammonia in Fountain Creek is a problem and is high; in fact, below the Security plant the recent mean is 26.8 mg/l. The level will remain high until all plants are operated soundly, until all plants have adequate capacity, and until all meet the recommended secondary treatment standards. The level of NO_3 you mentioned is a measurement of total nitrogen as nitrate. My information is that nitrate, measured as nitrate, averages about 32 mg/l - as shown in the same data series as your figure. This is substantially below the 45 mg/l standard for NO_3 in domestic waters.

4. Phosphorous levels in Fountain Creek vary from 6.3 mg/l below the Colorado Springs STP to 3.9 below the Stratmoor STP to 6.4 mg/l below Security STP to 3.0 below Fountain. In the Widefield aquifer measurements at the Venetucci Well No. 3 and Widefield Well No. 4 indicate total phosphorous levels of 0.045 and 0.01 mg/l. Recent

measurements by Colorado Springs in the Clear Springs Ranch area range from 0.8 to 1.0 mg/l. The major concern with phosphorous is eutrophication in streams and lakes. Little of this exists in Fountain Creek and the levels of phosphorous actually in the aquifer are generally within the groundwater pollution indicator level you mentioned.

5. Few ABS measurements have been made recently and there have also been few, if any complaints about foaming tap water. Your statement is the first reported to the 208 program. I understand that since detergent manufacturers started making more bio-degradable products in the early 1970's, ABS has decreased markedly. As noted we have received no reports of foaming water other than yours.

By pointing out the pollution levels above, it is not suggested that there are no problems or that nothing should be done until the difficulties achieve crisis proportions. In essence, the problems are considerable, but they do not appear to be as insurmountable as you imply. Project Aquarius has examined the Widefield aquifer situation and has proposed the following actions in order to further identify problems and progress towards meeting clean water goals:

1. Continued monitoring of nitrate levels in the Widefield aquifer and in the stream.

2. Major improvements to the Colorado Springs treatment facilities including sludge handling.

3. Major improvements to the Security treatment facilities.

4. Connection of Stratmoor A and B Plants to Colorado Springs, thus eliminating two point sources.

5. Connection of Garden Valley to Colorado Springs, eliminating a further point source.

6. Connection of the Fountain Valley Shopping Center to Security, eliminating another potential pollution source.

7. Preparation of a storm drainage manual for adoption by local governments to assist in the control of non-point sources of pollution.

8. Reuse of Colorado Springs wastewater for landscape irrigation and industrial use in order to reduce waste loads delivered to the stream and make more efficient use of water resources.

These steps, if implemented, can and will reduce the difficulties and will help to meet our goal of protecting groundwater in the Widefield aquifer. I hope that on re-examination you will agree.

I have taken the liberty of sending a copy of your letter and this response to Wright-McLaughlin Engineers. Because of their involvement in the regional sludge handling plan, in your facilities, and in those of the City of Colorado Springs, all under the auspices of Project Aquarius, it is important that they are fully aware of your concerns and the nature of recent data.

Sincerely,

Roland Gow

Roland Gow
Project Director

srb

cc: George Price, Colorado Department of Health
Wright-McLaughlin Engineers

RECEIVED JUL 6 197

WIDEFIELD HOMES WATER COMPANY
3 WIDEFIELD BOULEVARD
COLORADO SPRINGS, COLORADO 80911
PHONE: 392-3411

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1 July 1976

Pikes Peak Area Council of Governments
27 E. Vermijo
Colorado Springs, CO 80903

Attn: Mr. Roland Gow

RE: Project Aquarius-Draft of Area Wide Water Quality Management Plan, El Paso and Teller Counties.

Dear Roland:

The Widefield Homes Water Company supplied Peaceful Valley Lake Estates Company with a letter on 6 June 1972, stating that this company will operate and maintain the Peaceful Valley water distribution and sewer system services when the systems are completed.

We verbally emphasized to Mr. R. F. Hammond, General Partner, Peaceful Valley Lake Estates that this company could not, and would not operate or maintain the systems except under a labor contract.

Since no contract for labor has been offered or negotiated by the principles involved, the Widefield Homes Water Company denies any and all responsibility for operation and maintenance of the Peaceful Valley Water and/or Sewer systems.

We therefore request that pages 230 and 231 of the Area Wide Water Quality Management Plan for El Paso and Teller counties be corrected as follows:

Page 230, last paragraph: Delete last sentence

Page 231, fourth (4th) paragraph: Delete third (3rd) sentence

Very truly yours,

James C. Perry
Vice-President

JCP/jal

J. H. W. Investment Company
3 Widefield Boulevard
Colorado Springs, Colorado 80911

29 June 1976

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Pikes Peak Area Council of Governments
27 E. Vermijo
Colorado Springs, CO 80903

Attn: Mr. Roland Gow

RE: Project Aquarius-Draft of Area Wide Water Quality Management Plan, El Paso and Teller Counties.

Dear Roland:

The following information is submitted at the request of the Widefield Homes Water Company.

On the second (2nd) day of June 1972, a "Water Production Agreement" was entered into between the J.H.W. Investment Company, a Limited Partnership, and Peaceful Valley Lake Estates Co., a Limited Partnership.

This agreement pertains to water only, and under the terms, the J.H.W. Investment Company agreed to deliver water, in certain quantities and under certain conditions, into a water system constructed by Peaceful Valley Lake Estates, and deeded to J.H.W. Investment Company, WHEN MUTUALLY AGREED.

J.H.W. Investment Company entered into an agreement with the Widefield Homes Water Company to negotiate a "Labor Only" contract for operation and maintenance of the Peaceful Valley Lake Estates Company Water system, at an unspecified future time.

Peaceful Valley Lake Estates Company agreed to install the water system in accordance with Widefield Homes Water Company specifications. Peaceful Valley Lake Estates Company failed to install the first phase of their system in accordance with specifications. Several conferences were held in April and May of 1973 with Peaceful Valley Lake Estates Company personnel. The discrepancies were pointed out. After each conference Peaceful Valley Lake Estates Company agreed to correct discrepancies and bring the water system up to an acceptable standard.

To date, the corrections have still not been made.

The J.H.W. Investment Company will not agree to accept a quit claim deed on the existing water system until discrepancies have been cured, at which time a Labor Contract for Operation and Maintenance will be negotiated with Widefield Homes Water Company, or with some other company to provide maintenance service.

At a meeting with Peaceful Valley Lake Estates Company personnel on 19 April 1973, they expressed a desire for "Widefield" to operate and maintain the sewer and lagoon system upon completion.

page 1 of 2

This was followed by a letter on 26 April 1973 from Peaceful Valley Lake Estates Company to J.H.W. Investment Company, in which they stated they would quit claim sewer lines and lagoon to J.H.W. Investment Company when completed. This was not agreed to by the J.H.W. Investment Company.

The above letter also stated, "It was agreed that Widefield Homes Water and Sanitation Company will operate and maintain the Peaceful Valley Lake Estates Water and Sewer systems, when the systems are complete, as per letter of agreement dated 1 June 1972."

This statement is in reference to a letter from Widefield Homes Water Company to Peaceful Valley Lake Estates Company, dated 6 June 1972, in which they stated they would operate and maintain the Peaceful Valley Lake Estates system when completed.

This letter was provided by the Widefield Homes Water Company at the request of Peaceful Valley Lake Estates Company and J.H.W. Investment Company in anticipation of a negotiated "Labor Only" contract.

To date, no contract has been signed between Widefield Homes Water Company and J.H.W. Investment Company.

In view of the above, all reference to Widefield Homes Water Company in connection with Peaceful Valley Lake Estates sewer system should be deleted.

Under the present circumstances, all operation and maintenance responsibility is with Peaceful Valley Lake Estates Company for their own system.

Jules H. Watson
General Partner

Chipita Park Homeowner's Association
Chipita Park, Colorado

July 5, 1976

Roland Gow
PPACG
27 East Vermijo
Colorado Springs, Colorado 80903

Dear Mr. Gow:

The draft report on Project Aquarius furnished with the PPACG memorandum of May 26, Draft Summary of June 1976, have been reviewed. It is noted that the comments and recommendations of the Upper Fountain Creek representatives at the conclusion of the January workshop were not incorporated in the report.

The draft report again includes speculative material presented in such a way that it might be construed as factual. The following are suggested rewrites of material pertaining to Upper Fountain Creek Management Sub-Region which would result in the report being consistent with the present status of investigations.

Page 64, under 'Individual Sewage Treatment Systems'

Table 11-15A on page 70 shows that the wording for Upper Fountain Creek Area should read,

"• The upper portion of this reach of the stream does not meet A1 standards for fecal coliform, but the entire reach meets B1 standards."

Page 65, under 'Upper Fountain or Ute Pass Area'

Change wording to read,

"• The stream system will be classified at a level necessary to protect and propagate aquatic life and provide for limited body contact recreation. This is the only segment recommended for aquatic life in the Fountain/Monument basin.

- This will require a B1 classification.

- Waters in the stream now conform to B1 standards."

Page 66, second and third paragraphs

Change wording to read,

"The nature of the terrain within the Ute Pass area is such that septic-tank type sewage disposal must be used carefully.

Small-scale variations in soil types, variable groundwater tables, steep slopes, proximity to other septic systems, shallow and/or exposed bedrock must be taken into account. Inadequate installations will result in septic system and leaching field failures characterized by raw sewage surfacing upon the ground. The El Paso City/County Health Department has estimated that an average of approximately 20 to 30 septic system failures occur annually in the area.

Another possible result of septic system failures is the contamination of groundwater and adjacent surface waters. The extent of their actual contribution, if any, has not been established, but is currently under investigation by sampling of the stream and of wells in the aquifer."

Pages 68, 70, Tables

- Use Table II-15 and II-15A to place the sampling locations in proper geographical sequence, and make corresponding changes in text references on pp. 66,69. It is pertinent to note the degradation of stream quality between station 90 and CDH station west of Manitou Springs.
- Resolve apparent errors in mathematics in deriving the mean values in the table II-15A from the detail data that we were given.
- Re-caption Station 95 as 'Western One-fifth of Chipita Park'
- Re-caption Station 94 as 'Mid-point of Chipita Park'
- Add the State B-1 standards in the footnote.

Page 69, last paragraph, continuing to page 71

- Give statistics dating back to 1970 at least, to show whether failures are indeed increasing.
- Verify that the count of failures is the number of separate systems that failed, not including multiple problems with any single system. (NOTE: installation of a new septic tank should not by itself be interpreted as a failure, as conversion from summer to year-round use often involves this step).
- Rather than state 'To date in 1976...' give specific date.

Page 71, second paragraph,

Change to read,

"Although no definite conclusions can be drawn at this time, it appears that fecal onctamination of Fountain Creek is centered in Green Mountain Falls. Table II-15A shows that coliform counts improve rapidly thereafter. To date, no specific evidence has been located to identify the exact source of pollution. Although runoff from the stables has not been eliminated from consideration as a source, the data does not wholly support this theory at this time.'

Page 119

Put Woodland Park and Ute Pass in separate paragraphs, as they are treated separately everywhere else. The encouragement of basic industries and selective annexation is Woodland Park's plan, and is not applicable to the Upper Fountain Creek Management Sub-Region.

Page 127

Verify the figures for Ute Pass population in 1964 and 1973. Neither of the numbers seems realistic; as our best information is the maximum summer population is less than 3000.

Page 128

Verify the figures for Ute Pass employment in 1964 and 1973. Do they indicate 'employed in Ute Pass', or 'living in Ute Pass and employed anywhere'?

Page 167, (map)

- Under 'A. Legend', delete the word 'dense'.
- Under 'D. Non-point Source Characteristics'

Change to read,

"No agricultural or mining activities. Silvicultural activities are strictly controlled as the highlands to the southwest of Fountain Creek are watershed for municipal water supplies.

The nature of the terrain within the Ute Pass area is such that septic-tank type sewage disposal must be used carefully. Small-scale variations in soil types, variable groundwater tables, steep slopes, proximity to other septic systems, shallow and/or exposed bedrock must be taken into account. Inadequate installations will result in septic system and leaching field failures characterized by raw sewage surfacing upon the ground, with possible contamination of groundwater and adjacent surface waters. High septic-system densities occur in limited areas."

Page 176, under 'Upper Fountain',

Change uses to read,

"Water supply; aquatic life; wildlife; recreation; limited body contact."

(There is no agricultural use).

Page 197, Table V-3, and page 6 of Summary Table 1, entries for 'Fountain Creek from Crystola Creek to confluence with Monument',

Change as follows:

Under 'Recommended 1983 State Classifications and Exceptions' enter B-1, instead of A-1.

Under 'Recommended Uses'
enter 'Aquatic/wildlife, Limited body contact/Recreation, Water supply/recharge'.

Page 241, E, second paragraph,

Change to read,

"Chapter II assessed the present water quality problems and the nonpoint source situation in the Ute Pass area. Water quality data presently available indicate that there is a high fecal coliform count in the waters of about a 3-mile stretch of Upper Fountain, which does not emanate from its tributaries. This is under investigation by a stream and well sampling rpogram whose results are as yet inconclusive."

Page 265, second paragraph,

It is noted that this 1976 population estimate of 3000 is smaller than the 1973 population estimate of 3850 on page 127.

After you have had an opportunity to revise the Draft Report, and the Draft Summary, the representatives of Upper Fountain Creek would like to have a meeting to discuss the final version of the Project Aquarius report as it pertains to us.

These requests represent the consensus by the following representatives of the Upper Fountain Creek Management Sub-Region:

Green Mountain Falls:	Robert L. Palmer, Mayor
Chipita Park:	Louis G. Feil, Pres. Homeowner's Assn.
	James T. Dicker, V-Pres. " "
	Wm. A. Coates, Board " "
Cascade:	Robert L. Andreason, Repr. Prop. Owners Assn.
	Fern Johnson, Secretary " " "

Sincerely,

Louis G. Feil.

Louis G. Feil, Chairman of
Representatives of the Upper
Fountain Creek Management Sub-Region

Robert L. Palmer

Robert L. Palmer,
Mayor, Green Mountain Falls

PIKES PEAK AREA COUNCIL OF GOVERNMENTS

PPACG

MICHAEL J. MEEHAN
Executive Director

27 EAST VERMIJO
COLORADO SPRINGS, COLORADO 80903
PHONE (303)471-7080

July 19, 1976

MEMORANDUM

TO: File

FROM: Roland Gow

SUBJECT: Response to Ute Pass Concerns

Met with Ute Pass representatives on July 13, 1976, at 7:00 p.m. in Marcroft Hall. Discussed point by point all their concerns and the actual changes that were to be made in the document. All their points were covered. Only point of disagreement was the A1 - B1 classification. I noted that an interpretation of the law was that A classes only were acceptable. They expressed concern over meeting standards that were too high for the use of the stream. I suggested that a recommendation be included regarding the public health risk levels of fecal coliform. This has been included. The meeting concluded to the satisfaction of both parties at 7:41 p.m.

Present were George Feil, James Dicker, Bill Coates, Bob Andreason, Claudia Ely, and Roland Gow.

OLORADO OPEN SPACE COUNCIL 1325 DELAWARE ST. DENVER, COLO. 80204 303/573-9241

July 2, 1976

Mr. Roland Gow
Project Director
Project Aquarius
Pikes Peak Area Council of Governments
27 East Vermijo
Colorado Springs, CO 80903

Re: Draft PPACOG 208 Plan

Dear Mr. Gow:

The Water Quality Workshop of the Colorado Open Space Council has reviewed the draft of the Areawide Water Quality Management Plan for El Paso and Teller Counties. Our analyses have led us to conclude that the Draft Report is inadequate and is unacceptable as a 208 Water Quality Management Plan.

More specifically, the Draft Plan is inadequate in at least six major areas.

1. The Draft Plan does not achieve the goals or requirements of a 208 Plan. The Draft Plan does not set forth a plan for achieving fishable and swimmable water quality in the region by 1983. The Draft Plan does not achieve the goals put forward on pages 176-177 of the Draft Plan.

2. The Draft Plan is based upon stream water quality exceptions, and therefore, in effect, tends to be a negative plan. The Draft Plan is based upon the attainment of several stream classification exceptions (Class C). The Water Quality Control Commission has not granted these exceptions. Further, such exceptions are for short term periods. No plan alternatives are presented for meeting national water quality goals. Commission policies require that an "economic hardship" be demonstrated for a C classification. No such hardship is demonstrated in the Draft Plan.

3. The Draft Plan does not adequately address population and land use issues in regard to water quality management. The Draft Plan is based upon ambitious growth projections (83% over the next 25 years) which are not consistent with state population distribution policies. Furthermore, the impact of these ambitious population projections on the ability to achieve the 1983 goals of PL 92-500 are not specifically identified.

4. The Draft Plan is based primarily on secondary treatment. The apparent approach to the Draft Plan has been to provide primarily secondary treatment. In areas where this is not sufficient to achieve state wa-

ter quality standards, exceptions are requested. Too much emphasis is placed upon the construction of interceptors and higher capacity plants to serve population growth rather than higher quality treatment for more reasonable levels of growth. Adequate planning has not been demonstrated for the protection of downstream water supplies from nitrates, viruses, organic compounds, etc.

5. The Draft Plan does not adequately address the land treatment alternative. Land treatment is dismissed as a major alternative without adequate analyses even though Colorado Springs in earlier years was a recognized leader in recycling sewage effluent. Assumptions in regard to land treatment—such as 70% consumptive use, prefiltration requirements, no public acceptance, irrigation of new lands, etc.—are not adequately explained. The use of such constraining and non-optimizing assumptions illustrated a bias against a revenue-producing facility which is capable of treating to a high level of quality. Reference can be made to the July 1973 American Public Works Association Publication, Survey of Facilities Using Land Application of Wastewater, which is probably in the PPACOG library.

6. The Draft Plan would lead to further problems with municipal water supplies at Security, Widefield, and Stratmoor Hills. Water quality problems have existed in the past. There have been complaints of foaming tap water due to ABS. Fountain Creek is considered to be one of the most polluted streams in Colorado according to Colorado Department of Health data. Stream water is used for direct recharge of the municipal aquifer.

For the above reasons we find the Draft Plan unacceptable. In its present form, we recommend that the Water Quality Control Commission reject the plan and the gubernatorial certification not be granted.

Sincerely yours,

COLORADO OPEN SPACE COUNCIL

Mary C. Taylor

Mary C. Taylor
President

cc: Governor Richard Lamm
Jim Monaghan
Gary Broetzman
Harris Sherman
Water Quality Control Commission
John Green, Region 8 EPA

PIKES PEAK AREA COUNCIL OF GOVERNMENTS

PPACG

MICHAEL J. MEEHAN
Executive Director

27 EAST VERMIJO
COLORADO SPRINGS, COLORADO 80903
PHONE (303)471-7080

July 9, 1976

Ms. Mary C. Taylor
President
Colorado Open Space Council
1325 Delaware Street
Denver, CO 80204

Dear Ms. Taylor:

I am in receipt of your letter of July 2 regarding the Pikes Peak Region's "208" plan, and am frankly surprised at the lack of depth and understanding your analysis displays. Since you took no time to ask questions of anyone connected with Project Aquarius or to secure background material on the plan the inadequacy of your remarks is, in retrospect, not so hard to understand.

The purpose of the "208" planning process is to develop environmentally sound, publicly acceptable, implementable plans for managing water pollution on an area-wide basis. You apparently understand neither the nature of the planning process nor the vital need to implement what is being proposed. Our plan is aimed at getting certain things done for the local region as part of the overall state plan for water quality. A pragmatic approach rather than an ivory tower perspective was demanded by the elected officials of this area. Indeed, if implementation were not the key to our approach we would have wasted two years and the money provided by EPA.

Achievement of the 1983 goals of the Water Pollution Control Act Amendments of 1972 is, as stated in the plan, a goal of this area. In spite of your comments we will achieve those goals in the Teller County, Upper Fountain and Upper Monument areas. The Act also points out that goals shall be achieved on a "where attainable" basis. We do not believe, and neither do some eminent ecologists, that it is possible to gain the fishing and swimming goals on Monument and Lower Fountain Creeks. Instead, our plan strives to maintain and improve existing aquatic habitat, protect health and water supply, and provide for recreational use of the streams. Because of the inability of the streams, from a physical environmental standpoint, to support major aquatic life i.e. fish, the region decided it would be inappropriate to recommend spending substantial money to try to make them support fish. Hence, we have requested exceptions for ammonia, chlorine residual, and in a short stretch below the Colorado Springs plant, dissolved oxygen.

I am not aware of the Colorado Water Quality Control Commission's "policy" on economic hardship relative to the granting of exceptions. Indeed, many people, including, I suspect, COSC, consider the justification of exceptions based solely on economic factors to be unacceptable. Our main justification for the exceptions is environmental, and I believe that is a proper way to seek such variations from the standards. The plan fully meets the requirements of the "208" program, the goals set out within it, and the national goals, where attainable.

Your comments on the population projections used for planning purposes are most illustrative of your ignorance of the local process. Had you taken the time to familiarize yourself with the issues and their resolution your discussion might have been less vitriolic. The figures represent the mid range of projections for the Pikes Peak Region; figures that were subjected to local scrutiny and discussion before they were employed. Given what many believe to be the economic advantages of this area, the figures are quite attainable and for planning purposes may even be conservative. Furthermore, they do not contravene State population distribution policies because such policies have not, in fact, been adopted by the State. You must be aware that the Colorado Division of Planning is only just embarking on the development of growth policies for the State. Should you wish to participate in that decision making process, you might wish to contact the CDP.

It is impossible to separate growth from the attainment of water quality goals. Growth will cause great environmental pressures, but our analysis indicated that, given the appropriate exceptions, based on environmental considerations, we can have growth and clean streams with secondary treatment. Our proposal to use 1983 effluent limitations will protect downstream users. The continuation of our monitoring program will provide an early warning system to let us know when, if ever, further treatment steps are necessary.

The land application of sewage was considered and dismissed as not being a cost-effective treatment method at this time. The current infatuation with land application as the ultimate treatment method may have led you to miss the fact that the plan is vitally concerned with the reuse of water for industrial and landscape irrigation purposes. The plan notes the need for, and provides for special local studies of, landscape irrigation reuse on golf courses, medians, and other areas. Whenever economically feasible these practices have been and will be recommended. We did not consider reuse as a major treatment alternative but as a wise use of water resources that will have the added benefit of reducing pollution loads in our streams.

Your remarks regarding water supplies in the Lower Fountain Area are again indicative of a lack of knowledge of the area. Over the past decade or so there have been no problems with the quality of drinking water in the area as far as we have been able to determine. If you have recent documented cases I am sure the managers of the appropriate water supply systems would like to know. Incidentally, Colorado Springs draws significant water from the Widefield Aquifer and, of course, has some concern for the quality of its raw water supply.

In conclusion, it is my opinion that your remarks are ill-considered. Had you contacted local COSC representatives, even the Vice President of your own organization, you might have had something more constructive to say. That, we would have welcomed! But when a State special interest group does not even contact its local people and shoots strictly from the hip, no positive purpose can be served. While local COSC members may not be fully enamored with the exception process they did and do realize that the plan is a major and concrete step towards the improvement of water quality in the Pikes Peak Region. It is worthy of acceptance and certification by all parties as a positive practical approach to solving water pollution problems. And in an era when plans have sat on shelves too often, the plan is a significant departure.

Sincerely,

Roland Gow

Roland Gow
Project Director

cc: Governor Richard D. Lamm
John Green, Regional Administrator, EPA
Harris Sherman, Chairman, CWQCC
Evan Dildine, Technical Secretary, CWQCC
Robert Isaac, Chairman, PPACG
James Monaghan, Governor's Staff
Gary Broetzman, State "208" Coordinator
Mike Stiehl, Vice President, COSC

ka

RECEIVED JUL

July 29, 1976

COLORADO OPEN SPACE COUNCIL 1325 DELAWARE ST. DENVER, COLO. 80204 303/573-92

Roland Gow, Project Director
Project Aquarius
Pikes Peak Area Council of Governments
27 East Vermijo
Colorado Springs, CO 80903

Dear Mr. Gow:

We have received and carefully studied your letter of July 9 concerning our comments on the Draft Project Aquarius 208 plan. We were of the hope that your reply to our comments would have been more constructive and dealt more specifically with our questions. We stand by our comments.

In our view your draft document does not satisfy the requirements of a 208 Plan. The 208 planning process was intended to provide a mechanism for comprehensive water quality and water resources planning. The Draft Plan falls short of identifying all the various opportunities available for achievable water quality management. Too much emphasis has been placed on gathering data. This is only the first step in the planning process and more weight should have been placed on developing strategies for achieving water quality.

We agree that Lower Fountain Creek may not in its present condition support active aquatic life. We would go further to say that it has been badly polluted downstream by Colorado Springs municipal sewage. This, however, does not mean that this condition has to continue in the future. We believe a stream can be classified for aquatic life if it will be suitable in the future. Aquatic life designation is a water quality parameter rather than a fish life indicator. For instance, aquatic life designation would protect downstream municipal water supplies.

Wastewater management planning, when viewed as an opportunity rather than as a minimum federal requirement for grant money, can provide an opportunity for total water management systems. Some examples would include ground water recharge, open space irrigation, low flow augmentation, recreational use, and others. Techniques are also available with minimum effort to improve stream bottom conditions and flow characteristics to support aquatic life and improve recreational opportunities. Efforts currently under way in Denver, Boulder, San Antonio, Muskegon and other areas are examples of the opportunities available.

Stream flows in the Colorado Springs area are improving because of the substantial pure transmountain diversions used as water supplies. This increased resource availability needs to be maximized for the overall good of the community. The achievement of less than minimum water quality standards and limited industrial reuse does not take full advantage of these increased supplies.

The Draft Plan does not demonstrate a serious consideration of the various water resources planning opportunities which should be considered as a part of the 208 planning process. We will continue to request that the Draft Plan not be accepted until such an effort has been undertaken.

In order to accommodate these concepts which we consider to be essential for a successful 208 Plan, we would suggest that the overall status of the program be reviewed. The purpose of this review would be to determine actual deadlines for the Plan, budgetary conditions and opportunities for Plan revision and expansion. It is our hope that in such a review of the Draft Plan, a Final Plan can be developed and adopted which can be a model for the other 208 Plans in the state. We welcome the opportunity to participate in the review process.

Yours very truly,

Mary C. Taylor

Mary C. Taylor
President

cc: Governor Richard D. Lamm
John Green, Regional Administrator, EPA
Harris Sherman, Chairman, CWQCC
Evan Dildine, Technical Secretary, CWQCC
Robert Isaac, Chairman, PPACG
James Monaghan, Governor's Staff
Gary Broetzman, State "208" Coordinator
Mike Stiehl, Vice President, COSC

RECEIVED JUL 6 1976

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE ACADEMY
USAF ACADEMY, COLORADO 80840

DEPARTMENT OF DEFENSE

1 JUL 1976

REPLY TO
ATTN OF: DE

SUBJECT: Comments on Draft Plan (Your Memo, 26 May 76)

TO: Pikes Peak Area Council of Governments
27 East Vermijo
Colorado Springs, Colorado 80903

Thank you for the opportunity to comment on the draft of the Areawide Water Quality Management Plan for El Paso and Teller Counties. It has been a worth-while experience for us to participate in the series of Aquarius Workshops. The draft plan is excellent and the Air Force Academy wishes you success in its implementation. We are looking forward to continued support and cooperation.

W. Rogers Craig

W. ROGERS CRAIG, Lt Colonel, USAF
Base Civil Engineer

CITY-COUNTY HEALTH DEPARTMENT

Colorado Springs -- El Paso County, Colorado 80909

Telephone: 475-8240

CENTRAL ADMINISTRATION: 501 NORTH FOOTE AVENUE, 80909
SPECIAL SERVICES BLDG., 710-712 SOUTH TEJON, 80903
VITAL STATISTICS: 27 EAST VERMIJO, 80903
CODE ENFORCEMENT: 105 EAST VERMIJO, 80903

July 6, 1976

Roland Gow
Assistant Director
P.P.A.C.G.
27 E. Vermijo
Colo. Spgs., Colo. 80903

Dear Mr. Gow:

Thank you for the opportunity to review "Project Aquarius Areawide Water Quality Management Plan for El Paso and Teller Counties."

We are in basic agreement with the total plan, however, some of the "ideas" such as prescribed reinspections and data management are quite costly as you know.

Some of the"problems - recommendations" as stated are not quite correct; e.g. the last problem on page 331: the failure of cleaning is part of the problem, but geology must be included. At the bottom of page 333, inspections of water and sewer are made by the Health Department.

Roland, we believe you did a good job on the whole presentation and as I stated to you by phone, there is little sense to "knit pick" a document as extensive as this.

Good Luck.

Sincerely,

F.A. Otoupalik

Frank A. Otoupalik
Director
Environmental Health Services

FAO:lb

TELLER COUNTY HEALTH SERVICES

GEORGE M. HEMMING
ENVIRONMENTALIST

BOX 118
WOODLAND PARK, COLORADO 80863

Roland Gow
Project Aquarius
PPACG
27 E. Vermijo Ave.

Dear Roland,

Congratulations are in order as you near the completion of Project Aquarius. The study has compiled much useful information. The value of the plan will be realized in the future if it can be utilized in a realistic manner by those with access to it.

The one related area which still concerns me is regulation requirements affecting small municipal sewage treatment plants. As you know from experience, most smaller operations cannot or will not comply with requirements of state and federal regulations. A case in point is the NPDES monitoring requirements. The laboratory equipment required for compliance with NPDES costs at least $5,000 without consideration of housing. This coupled with the need for a trained technician is an insurmountable burden to most small municipalities.

Centralization of the testing program is of course one obvious solution. Another possible solution is the lowering of testing procedure standards allowable under NPDES. Efforts by industry (i.e. Hach Chemical Company) to have simpler testing methods accepted by EPA should be supported.

An awareness of the funding and manpower problems found in rural areas is necessary for the realization of many of the goals of Project Aquarius.

Sincerely,

GMH PPS

RECEIVED JUL

TELLER COUNTY COLORADO
PLANNING DEPARTMENT
P. O. BOX 1886
Woodland Park, Colorado 80863

Larry Kallenberger
[redacted]
LAND USE ADMINISTRATOR
[redacted]
PLANNER

July 27, 1976

Mr. Roland Gow
P.P.A.C.G.
27 E. Vermijo
Colorado Springs,
Colorado

Dear Roland:

Teller County wishes to add its congratulations on the completion of the first segment of Project Aquarius.

Wastewater planning is literally a dirty job which is needed in the long range; yet often ignored when it takes place.

You are aware of my apprehensions about the 208 Planning Program in rural areas. We have had a great fear that our citizens hopes will be encouraged; but that construction funds will not follow the massive planning efforts of recent years. It is very difficult to convince rural citizens that federal planning programs ever result in direct benefit in their areas.

Of course, one way to break free from this dilemma is through vigorous pursuit and delivery of construction funds assistance from that same federal government. We do not expect that every need outlined in 208 Planning be fulfilled immediately. We do expect that our most urgent need be addressed in the very next step.

Many needs in Teller County are outlined in the Project Aquarius report, however, we recognize the Village of Divide as our most immediate and pressing project. Septic failures coupled with the absurdley high groundwater table make the need for central sewage collection and treatment of utmost importance.

We look forward to working with you during the next phase of Project Aquarius, and helping to bring the construction moneys needed to fulfill planning dreams into this region.

Sincerely,

Larry B Kallenberger

Larry B. Kallenberger
Land Use Administrator

LK/bl

EST. 1861

EL PASO COUNTY

LAND USE DEPARTMENT

27 EAST VERMIJO
COLORADO SPRINGS, COLORADO 80903

August 16, 1976

Mr. Roland Gow
Assistant Director
Pikes Peak Area Council of Governments

27 E. Vermijo
Colorado Springs, Colorado

Dear Roland:

We have reviewed the draft of the Areawide Water Quality Management Plan for Teller and El Paso Counties. The report appears to be consistant with the guidelines developed during the three Project Aquarius workshops. As a reasoned attempt to address both political realities and clean water standards, the plan treads the thin and precarious line between local control and federal requirements, environmental necessity and economic reality. The attempt to do so is the plans greatest strength and, conversely its most serious weakness. Environmentalists will undoubtedly see it as tenative in its approach to structural implementation (an approach that may be characterized as fragmented regionalism) and environmental degradation (proposals to suspend certain stream quality standards). Advocates of local control and rapid growth may view the plan as a potential usurpation of local initiative and private perogative. The thing to be remembered is that the goal of the plan is to clean up the water, not to centralize decision making or reflect a dominant political and economic philosophy. As an attempt to meet this modest goal; water that people can swim in or drink without contracting disease or experiencing undue discomfort and within which other life forms may survive, the plan outlines a mechanism which provides a framework for functional coordination. The success of the region in effectively utilizing this framework will not be as dependent upon the form of the administrative mechanism, as it will be on the committment of the elected officials and the taxpayers to the goal of clean water.

Specific comments on portions of the plan follow:

1. Administrative Structure

   The county plays a dual role in the administrative and planning structure outlined in the report. As a member of the various sub-basin associations, the county will have a voice in the administrative decision making process. As a land use regulatory agency, the county will refer land use proposals to the management associations for review and comment. The process seems a bit cumbersome, however, it is assumed that the working process, once established, will overcome potential areas of duplication.

2. Planning Structure and Functions

PPACG is identified as the water quality planning agency. Included with this responsibility is an involvement with land use planning. The degree and nature of this involvement should be more clearly defined. The relationship between the comprehensive planning activities of the PPACG and the functional planning activities of the various entities comprising the management association should also be defined in greater detail.

3. Ultimate objectives of the Plan

The following statement should be clarified:

"......a decentralized approach to areawide wastewater management would be preferred over a highly centralized approach.....However, the existing barriers and conflicts do not preclude a change in the existing structure, if an appropriate plan and implementation strategy can be adopted. A major effort should be given to improving and formalizing the relationships of the sanitation districts to the planning organization, the relation of wastewater management and planning organization, the relation of wastewater management and planning to land use planning, and the degree of administrative centralization - by contract or other appropriate relationship."

Is this an integral part of the plan (i.e. is administrative and planning centralization an ultimate goal of the plan?)? Is the goal of the planning mechanism to establish an increasing degree of centralization, both in land use planning and administration? Does the role of PPACG as the planning and coordinative agency imply that PPACG is seen as eventually fulfilling the regional responsibility outlined? The county is unable to comment on these possibilities without further clarification. It appears that the statement should either be deleted or explained.

4. Relationship to H.B. 1041

The county has been given broad review and approval authority with reference to both land use decision making and wastewater management under H.B. 1041. The strategy to be employed in utilizing this authority has been to utilize existing regulatory mechanisms to deal with the issues raised by H.B. 1041. Specific wastewater proposals and extensions will be reviewed as part of the land use proposals necessitating the construction of facilities. For example, a land use proposal (subdivision, industrial park, etc) requiring additional wastewater treatment facilities or extension and expansion of existing facilities will be reviewed by both the management associations and the wastewater planning agency. Approval or denial of the proposed land use will be partially a function of the comments received based on the referrals. Thus a new facility will be reviewed by the planning agnecy with reference to the adopted plan. If the facility does not conform to the plan, the developer may be required to restructure his service arrangements to conform to the plan. If he is unwilling or unable to do so, it is assumed that the county could deny the land use change under the authority granted by 1041. This approach avoids the creation of a further level of review and approval and coordinates the need for facilities with land use proposals. The referral process is much the same as that now employed under S.B. 35.

5. Population Projections

The Plan projects a population for the region of 550,000 by the year 2000. At present approved plats and Master Plans within the unicorporated area project a population of 496,000. The uncertainties of economics, energy and regulation, render population forecasting marginal at best. It appears logical to tie the plan to population levels as achieved. What is important is that when the region reaches a population of 550,000 there are adequate wastewater treatment mechanisms, not that the legion attains a population of 550,000 in the year 2000.

6. Storm Drainage

The development of a drainage manual has been a major achievement of the 208 process. The administrative and planning mechanisms outlined are viewed with somewhat less enthusiasm. The initial plan, or the annual update, should address the feasibility of forming an areawide drainage district or developing a working organization comprised of the general purpose governments in the region to coordinate, review, and implement decisions relative to both stormwater runoff and drainage problems.

The draft plan represents a major expenditure of time, effort, and money by the PPACG staff, local governments, the general public, and the federal government. The data developed through the 208 process constitutes a valuable contribution to the local planning effort. Inclusion of the designated groundwater basins and Soil Conservation Districts into the overall wastewater planning and administrative process is a valuable and necessary innovation in an area as dependant upon groundwater as El Paso County. It is hoped that as the plan is revised and implemented, the planning agency will continue and strengthen efforts to include not only local government and technicians, but also the general public, developers, and the business community, in the planning and implementation process.

Sincerely,

Bill Wildman
Asst. Land Use Admin.

krs

LEAGUE OF WOMEN VOTERS
OF THE PIKES PEAK REGION

COLORADO SPRINGS, COLORADO

August 17, 1976

Mr. Roland Gow
Director, Project Aquarius
PPACG
27 E. Vermijo
Colo. Spgs., Colo. 80903

Dear Mr. Gow:

The Natural Resources Committee of the Pikes Peak League has read and discussed the Draft 208 Plan for our area, and has been informed of the criticisims directed to it by the Colorado Open Space Council. We do not agree that this is an inadequate and unacceptable plan, although we do not find it particularly innovative or exciting.

Our committee was naturally somewhat disappointed that this plan failed to provide more social and fewer technical solutions to water quality problems in the area. We also hoped that an authority with some teeth in it might be adopted to replace the current multitude of impotent districts. However, we are well aware of the political and economic conditions in the Pikes Peak region, and we feel that the plan you have devised correctly reflects the desires of the people in this area.

In fact, given the local political climate, we seriously doubt that any other sort of plan could have been found acceptable to those governmental entities involved. We feel that you are to be congratulated for devising any plan at all, and especially one which appears to satisfy 208 goals insofar as they are attainable in the peculiar waters of this region.

Sincerely,

Lee Ziegler

Lee Ziegler
Chairman, N.R.

cc: Harris Sherman
Gary Broetzman
John Green
Tess McNulty
Mary J. Taylor

3601 Azalea
Pueblo, Colorado 81005
September 8, 1976

Mr. Rowland Gow, Assistant Director
Pikes Peak Area Council of Governments
27 E. Vermijo
Colorado Springs, Colorado 80903

Dear Mr. Gow:

I am Chairman of a 15-member citizens committee known as the Fountain Creek Commission. The members of this Commission are appointed by the Pueblo City Council. The Commission has two basic objectives:

1. Study the Fountain Creek regarding flood control and make recommendations to the City Council.
2. Study the Fountain Creek for possible recreational usage and make recommendations to City Council.

Currently, one of the biggest issues in Pueblo is related to flooding and flood prevention on the Fountain Creek. I cannot over-emphasize the amount of concern which this issue has generated in Pueblo.

As a result of that concern, the Fountain Creek Commission, the Pueblo City Council, and the Pueblo Area Council of Governments has been actively pursuing some type of flood control assistance from the U. S. Army Corps of Engineers and the U. S. Congress. In 1974, we learned that the Congress had authorized construction of a dam on the Fountain Creek just north of the Pueblo City Limits. In February, 1976, funds were appropriated to the Albuquerque District Office of the Corps of Engineers to initiate the initial phase of the engineering design study for the dam.

We have had several meetings with representatives of the Corps of Engineers to discuss the proposed Fountain Dam. The District Engineer and several members of his staff came to Pueblo in November, 1974. In March, 1976, two staff members came to Pueblo to meet with the Fountain Creek Commission. In May, 1976, the District Engineer came to Pueblo for a public hearing on the proposed dam.

Throughout the discussion on the proposed Fountain Dam, we have been told repeatedly that the Fountain Dam cannot be economically justified unless a permanent recreation pool is maintained behind the dam.

This brings me to the point of this letter. In order for a permanent pool with recreational benefits to become a reality, the quality of the water must be maintained at a level which will accommodate body contact sports. We understand that the Pikes Peak Area Council of Governments under the Section 208 Water Quality Study is seeking a change in the classification of the Fountain River from B-2 to A-2. We strongly support such a change.

However, we also understand that three variances are being sought on oxygen, clorine residual and ammonia. The Fountain Creek Commission of the City of Pueblo strongly objects to these three variances. A higher standard of water quality is absolutely necessary if the Fountain Dam is to ever become a reality. And, as I mentioned earlier, this is one of the highest priority projects in the Pueblo Metropolitan Area.

We respectfully ask that this factor be taken into consideration in your deliberations.

Thank you for your assistance.

Sincerely,

Dorothy Urban

Dorothy Urban,
Chairman

DU:mm

cc: Colonel R. E. Leonard, District Engineer
Mr. Harris Sherman, Colorado Water Quality Control Commission
Charles "Tommy" Thomson, Southeast Colorado Water Conservancy District
Gene Fisher, Pueblo Regional Planning Commission

PIKES PEAK AREA COUNCIL OF GOVERNMENTS

PPACG

MICHAEL J. MEEHAN
Executive Director

27 EAST VERMIJO
COLORADO SPRINGS, COLORADO 80903
PHONE (303)471-7080

September 27, 1976

Ms. Dorothy Urban
Fountain Creek Commission
3601 Azalea Street
Pueblo, Colorado 81005

Dear Ms. Urban:

Thank you for your recent letter regarding the Pikes Peak Region 208 Plan. Your support for the A2 classification is appreciated, but we would ask you to reconsider your opposition to the exceptions requested. It is very doubtful whether any of the exceptions would affect the water quality of Fountain Creek as it crosses into Pueblo County.

The exceptions we have requested include the following:

1. Dissolved Oxygen - requested to be 4 mg/l for only 1000 feet (the mixing zone) south of the Colorado Springs sewage treatment facilities. Our observed minimum DO, about 4 miles south of the City of Fountain is about 7 mg/l - which is well above the A1 standard.

2. Ammonia is toxic to aquatic life (especially fish) in concentrations that depend on the acidity of the water and its temperature. Since we do not believe Fountain Creek can be a fishery we have recommended an exception for ammonia. This action was carefully considered in light of our genuine desire to improve the quality of Fountain Creek. However, the economic burden would be considerable. Our selected alternative suggests treatment costs of 15 cents per 1000 gallons for Colorado Springs. With ammonia removal the costs would rise to 28 cents per 1000 gallons. In other words the difference in treatment costs for Colorado Springs alone would be $260,000 per day at a daily flow of 20 million gallons.

   Should you persist in requiring no ammonia exception and should the State agree with you, then that extra cost would have to be added to the cost-benefit ratio of your suggested impoundment.

In any event, ammonia will decay before it reaches the County line and the impact on Pueblo County will not be severe - especially given the frequent zero flow conditions which occur in that area.

3. Chlorine is toxic to fish in certain concentrations but at this time chlorine is the most cost-effective disinfectant, and its application is necessary for the reduction of pathogenic bacteria in treated sewage. A small residual of chlorine is left in the stream, but this normally dissipates quickly after the introduction of discharge to the stream. In terms of a recreational pool in Pueblo County, I do not think that our excepted chlorine residual will affect it chemically. It could have a beneficial effect in reducing the number of bacteria entering the pool, thereby making the water much safer for body contact uses.

   You may be interested to know that the State, so far, has ignored the Project Aquarius recommendations regarding fecal coliform. The plan recommends effluent limits of 200/100 ml; the State is now issuing permits allowing up to 12,000 per 100 ml in the effluent of some treatment plants.

I will be happy to discuss these points at length with you and your Commission, but certainly hope you will modify your stand on our proposed exceptions.

Sincerely,

Roland Gow

Roland Gow
Assistant Director

sw

cc: Evan Dildine, WQCC
Terry Anderson, EPA

RESOLUTION CONCERNING THE WATER QUALITY OF THE FOUNTAIN CREEK UPON ENTRY INTO PUEBLO COUNTY

WHEREAS, the Pueblo Regional Planning Commission (PRPC) has been assigned responsibility by the Pueblo Area Council of Governments (PACOG) for the Section 208 Water Quality Management Planning Program; and

WHEREAS, the Pikes Peak Area Council of Governments (PPACOG) has underway its Section 208 water quality study for its jurisdiction; and

WHEREAS, the draft of the Areawide Water Quality Management Plan for El Paso and Teller Counties has been submitted for PACOG review and comment no later than July 6, 1976; and

WHEREAS, the PRPC 208 staff have reviewed the draft document;

NOW THEREFORE, BE IT RESOLVED that the Pueblo Regional Planning Commission recommends to the Pueblo Area Council of Governments for referral of this recommendation to the Pikes Peak Area Council of Governments and the Office of the Governor that the Pikes Peak Area Council of Governments give every consideration to establishing as a minimum the water quality standards prescribed for Fountain Creek as are presently existing.

INTRODUCED June 15, 1976

APPROVED:

Marvin Stein
Marvin Stein, Chairman

ATTEST:

William Savage
William Savage, Secretary

State of Colorado
EXECUTIVE CHAMBERS
DENVER

RICHARD D. LAMM
Governor

November 17, 1976

Mr. Robert Isaac, Chairman
Pikes Peak Area Council of Governments
27 East Vermijo
Colorado Springs, Colorado 80903

Dear Mr. Isaac:

This is in response to the 208 Plan prepared by the Pikes Peak Area Council of Governments, a draft of which was submitted to the State in June and a more final version in August. Our letter of August 3, 1976 provided preliminary comments on the planning document and pointed out that we were pursuing a coordinated response within State government, particularly with the Water Quality Control Commission.

After considerable discussion by the Commission and other pertinent State agencies, the consensus is that the plan provides a sound base for improving water quality management within the two-county area. The proposed management associations would provide an opportunity to considerably improve the fragmented approach for wastewater treatment that now exists in the area.

Before the plan can be submitted to the Governor for certification or conditional certification, we believe that several points of concern need to be further addressed to the satisfaction of both the Commission and the 208 Executive Committee under the Planning Coordinating Council within the Executive Branch. As you may know, we have adopted a review procedure in which the 208 Executive Committee relies upon the Commission for approval of the specific water quality issues in the plan. The Committee expands upon the Commission position to reflect upon more generalized water management concerns and issues. This we have done herein in accordance with the EPA program regulation.

Attachment 1 contains comments from the 208 Subcommittee of the Water Quality Control Commission emanating from a general discussion on the water quality features of the plan at the last Commission meeting. These comments address the water quality goals and objectives of the plan and associated wastewater treatment levels. Beyond the comments of the Subcommittee of the Commission (not yet reviewed by the full Commission), the 208 Executive Committee has identified several matters pertaining to the growth and development projections, management system, and ongoing planning that need further attention as shown on attachment 2.

All comments contained in the two attachments have been discussed in general with Roland Gow. We are well aware of the program deadline for your area and the need to proceed expeditiously. Our hope is to work with you and the COG staff in striving to resolve and clarify these matters to the extent possible at this time.

We are also aware, however, that this is the first stage of a continuing planning process for water quality management in the two-county area and that some concerns which cannot be reasonably resolved at this time might be properly deferred. With this in mind, we would like to suggest the following schedule:

- * (see note below)
- * Response on the comments contained in attachment 2 by December 10.
- * A local public meeting during the week of December 12, 1976 to permit comments from local governmental officials and interested citizens.
- * Any addendum to the plan should be submitted by December 31. That addendum would consolidate the previous responses made and address any new issues or comments raised at the public meeting. The addendum would need to be adopted and submitted by the Council.
- * Formal action on the water quality provisions of the plan by the Commission at the January 4, 1977 meeting.
- * Action on the plan and the management agencies by the 208 Executive Committee by January 14.
- * Action on the Plan by the Governor and transmittal to EPA by January 21.

This is an ambitious schedule and will need the cooperative effort of all parties involved. Although the State needs to act promptly, it also needs to act responsibly. The need for a public meeting during mid-December reflects a concern for the State to hear directly from your community leaders who will need to accept the plan to help assure its success. We trust that you share this concern and will take the lead in arranging for the meeting and in helping in its organization.

Thank you for your patience. This is the first 208 Plan within the State and we are all learning how to respond to the program need. Please get in touch with Gary Broetzman or me should you care to discuss the program further.

Sincerely yours,

Jim Monaghan
Assistant to Governor
for Natural Resources

Eugene R. Weiner

Concur: Dr. Robert Weiner
208 Subcommittee
Water Quality Control Commission

CC: Terry Anderson, EPA
John Green, EPA
Frank Hersman
Frank Rozich
Phil Schmuck
208 Executive Committee
Water Quality Control Commission
208 Policy Advisory Committee

*Response on the comments from the Commission (attachment 1) no later than November 29. This would permit the Commission to take a preliminary position on the water quality features of the plan at its December 7 meeting. --(inadvertently omitted in the original letter, but subsequently discussed with Mr. Isaac.)

Attachment

COMMENTS FROM 208 SUBCOMMITTEE OF THE WATER QUALITY CONTROL COMMISSION

(Note: This statement has not been officially adopted or approved by the Commission. Any questions regarding this document should be directed to Dr. Robert Weiner of the Subcommittee)

1. Proposed water classifications in 208 plans should be directed towards the realization of the 1983 water quality goals as set forth in PL 92-500.

2. Wherever attainable, proposed classifications must be equivalent to the present classifications or uses, whichever is more stringent. Attainability is to be judged by whether or not the classification quality paramaters can be achieved by any recognized technical method of treatment. Unattainability by this criteria is considered as permanent and would require that the proposed classification be downgraded from the present classification or use. Such an action will be evaluated by the criteria in the non-degradation statement of the adopted regulations.

3. In some cases, the present classification or use is attainable but it is felt that the steps required to achieve the required water quality are not warranted by the benefits received. Such a situation might exist because of non-water-quality conditions such as are discussed in item 4, below. This situation is considered as temporary. The proposed classification should be equivalent to the present classification or use and an exception should be requested. With an exception, the classification is not lowered but temporary exceptions are made for certain quality parameters in spatially limited portions of water. A proposed water quality exception must be accompanied by a compliance schedule for reaching the classification. The compliance schedule should be realistic and may extend beyond 1983. Where state and federal funding are needed, the compliance schedule may be indefinite in the timing of some of its steps. In general, requests for temporary exceptions are preferred over the more permanent downgrading, wherever it appears that the conditions causing the current non-compliance might be temporary within a 20 year time-frame. Retaining a classification higher than the present usage will serve as a reminder that the degrading conditions are correctable and will increase the priority for funding to correct them.

4. The classification system is designed to set forth the water quality parameters necessary to qualify given portions of the state's waters for certain uses. It is not concerned with non-water-quality conditions which also might be required for the intended use. Thus, conditions such as public access, channeling, flow velocity, etc., which are not within the jurisdiction of the Water Quality Control Commission are not taken into consideration. Although such conditions may limit the benefits received from control measures and, therefore, might be the basis for requesting exceptions, they frequently are temporary in nature and are not relevant to the issue of water quality. The attainability of a classification refers only to the appropriate water quality parameters in the adopted water standards.

5. All proposed publicly-owned treatment works must provide secondary treatment as a minimum. Industrial treatment must be best available technology. If the water classification cannot be achieved by secondary

treatment, then higher level treatment must be proposed or exceptions or downgrading must be requested. When planning a compliance program to eliminate temporary exceptions, it is preferable and often more cost-effective to plan for the best overall treatment right away, rather than seek the most economical first step of treatment, which must be followed by add-on treatments later. This approach will, in general, shorten the time period of the compliance schedule and because of the higher water classification, increase the priority for funding of treatment works.

6. In the PPACG 208 plan every effort should be made to retain as high a classification as possible on water segments such as Lower Fountain Creek below the Colorado Springs treatment plant. Since technical attainability of aquatic life water quality standards is possible, the issue is whether or not it is worthwhile. Therefore, exceptions should be requested and the accompanying compliance schedule should reflect the uncertainties of state and federal funding and, also, non-water-quality parameters affecting these decisions.

COMMENTS FROM THE 208 EXECUTIVE COMMITTEE

The 208 Executive Committee has raised several matters pertaining to the PPACG 208 plan for El Paso and Teller Counties. These matters need to be addressed further before final action can be taken on the plan enroute to the Governor. In general, the following comments and issues fall within the broader categories of population and growth projections, mamagement systems, response from elected officials, and continuing planning.

POPULATION AND GROWTH PROJECTIONS

The 208 plan is based upon a projected growth for the two counties of 550,000 by year 2000 as compared to the most recent State projections of 393,000 to 480,000 for that area. Discrepancies between local and State projections are of concern, particularly along the urban growth centers. The State is reluctant to accept the higher COG values as the basis for this plan and the associated grant supported projects until a better relationship is known between those values and the State growth and development policies being developed under the State 701 program and the air quality management program underway for the Colorado Springs area. At this time, perhaps a better understanding can be gained regarding the discrepancies in the projectic in terms of the data and policy imput. Specific comments that need response are:

* The population data for the regional projections should be put into the State model to determine if the basic computer models contribute to the discrepancie
* The basic growth policies used in the COG model with respect to timing, intensity and patterns of growth should be delineated.
* A comparison of the growth policies between the regional 208 and 701 programs is needed.
* A comparison is also needed between the land use programs in the individual communities and the regional growth policies incorporated in the 208 plan.

MANAGEMENT SYSTEM

The management system included in the plan would seem to be a significant improve over the currently frangmented array of governmental entities involved in water qu management within the two-county area. The proposed system, however, appears to lack a closely integrated system for the implementation of all features of the plan responsive to Section 208 (c)(2) of PL 92-500. Concern still exists over whether the proposed management associations and agencies will have sufficient authorities and capabilities to implement the plan. The relationships and coordinative procedures among agencies with wastewater management responsibilities (the management association), the growth and development responsibilities (local governments), and the non-point source responsibiliites need clarification. The following comments need to be addressed:

* A summary of legal authorities vested in each of the member governmental entities in the proposed management associations is needed with an explanation of the extent and method for transferring authorities to each of the management associations.
* An explanation is needed over the role of the proposed management associations in assuring that activities within member communities take place in conformance with the plan.
* A response toward the plan and the management associations is needed from all or most of the elected bodies of the affected local units of governments.

ONGOING PLANNING AGENCY

The plan identifies the PPACG as the ongoing 208 planning agency. Although this may be a logical outgrowth of the plan, the current internal problems of the COG may present some difficulties in support of that position. Response is needed on the following points:

* The status of the composition and future of the Council of Governments.
* The capability of the COG to provide representative planning over the two-county area.

PIKES PEAK AREA COUNCIL OF GOVERNMENTS

PPACG

MICHAEL J. MEEHAN
Executive Director

27 EAST VERMIJO
COLORADO SPRINGS, COLORADO 80903
PHONE (303)471-7080

November 30, 1976

RECEIVED
DEC 9 1976
[illegible]
Air and Water Programs Division

Mr. Jim Monaghan
Assistant to the Governor for Natural Resources
State Capitol, Executive Chamber
Denver, CO 80202

Dear Mr. Monaghan:

Thank you for your letter of November 17, 1976, in response to the Pikes Peak Region's '208' Plan. We have responded to the Water Quality Control Commission's subcommittee comments in a separate document (enclosed), and I wish to address the further issues raised by the '208' Executive Committee.

First, let me address the proposed schedule. Draft copies of the response to the Commission's Subcommittee have been mailed to the Commission and its staff. Since PPACG could not meet until November 30, 1976, we had no choice but to issue a draft statement. Mr. Gow will be able to discuss the action taken by PPACG and get some firm commitment from the Commission as arranged at its November 3 meeting, on December 7.

We do not feel a further public meeting on the plan is necessary. Our planning process fully included the public at key points, and we received comments on the plan from both public and private entities. Further discussion with the public, at this juncture, would seem to be both duplicatory and unproductive. Our interpretation of the Colorado Water Congress' letter which appears to have prompted the public meeting request is not that the Commission seek more public input to the '208' plans but that the Commission strongly consider the public participation that occurred during the individual area's planning processes.

Finally, as regards the schedule, we hope you will take no longer than January 21, 1977, to obtain the Governor's certification. We have already lost a great deal of momentum in getting the plan implemented, and our grant runs out on December 31, 1976. Now to the specific comments.

(1) Population and Growth Projections

Please refer to Mr. Gow's memo to the 208 Coordinating Council and the Water Quality Control Commission, dated August 24, 1976. At pages 7 and 8 you will find a discussion of the population questions.

Further reference to the Plan, pages 106 to 112, will provide additional documentation. Finally, reference to the enclosed volume Alternative Population and Employment Forecasts, El Paso County 1980-2000, Detailed Report will answer any questions on methodology. Our staff has been in touch with the State on the computer models and has provided input to your model. The attached letter dated August 12, 1976, is indicative of the material provided.

Part 1, of Chapter III of the Plan, pages 99-105, provides a good summary of regional growth policies. Pages 106-112 illustrate the timing and intensity of growth by area, by five year increments. The growth policies were adopted by PPACG on April 9, 1975, and reflect the local areas' desires. We cannot conceive of having different 208 and 701 growth projections or policies, hence consistency has always been a feature of our efforts. What you see in the plan is what we have.

PPACG revises its population data on a continuing basis, and will continue to do so in order to provide the best possible input to local plans and programs in both the public and private sectors. We would welcome your assistance in that effort but, at this time, do not believe that continued discussion is any cause for non-certification of our plan.

(2) Management System

Summaries of the legal authorities (relative to water quality management) may be found in the enclosed document An Evaluation of Waste Treatment Regulatory Practices, 1976. The mechanism for establishing the management association is a joint exercise of powers agreement, as noted on page 139 of the Plan. Pages 124 to 139 indicate the alternatives examined and the function of the management association (more specifically at pages 134 and 135). Chapter VIII discusses the powers of the designated management agencies (the association, etc.), as well as the continuing planning process. Since the associations are proposed as designated agencies, this assures that water quality management activities will conform with the Plan. In addition, we expect the general purpose governments to request review and comment on land development proposals from the designated agencies. However, land use control is the prerogative of general purpose government and that prerogative will not be relinquished in the Pikes Peak Area.

Responses from local officials to the Plan are contained in the plan document; you have already received copies of correspondence from a number of local governments. We feel these comments are more than adequate, especially when backed by our planning process.

(3) Planning Agency

At the present time the PPACG membership is made up of Colorado Springs, Fountain, Manitou Springs, Palmer Lake, Monument, Green

Mountain Falls, Woodland Park, Cripple Creek and Fairplay. The following governments are eligible for membership, but are not now members: El Paso, Teller and Park Counties, Ramah, Calhan, Victor, and Alma.

In January, 1977, we fully expect El Paso County to re-enter the PPACG. We shall continue to work with Teller and Park Counties in order to get them back into the organization.

Given our organizational structure and prospects we feel we can continue to provide representative professional planning services to the whole of the two-county area, and beyond. This capability will be enhanced by a water quality advisory committee composed of the designated management agencies (including Teller County) once that Committee is established early in 1977.

If you have further questions on our Plan please contact me.

Sincerely,

R. M. Isaac
Chairman

cc: John Green, EPA
Terry Anderson, EPA
Harris Sherman, Water Quality Control Commission
Phil Schmuck, Colorado Division of Planning

Enclosures

APPENDIX B

EPA MAILING LIST FOR DISTRIBUTING THE EIS

NOTE: Recipients of the Final EIS are indicated by an asterisk (*). The others on the list received a copy of the draft EIS but did not submit comments.

Mr. Teddy Adams
Northeast Garden Ranch Homeowners
Association

Mr. Sigurd Aga, Mayor
City of Fountain

Mr. Glenn Alexander
Donala Water & Sanitation District

Mr. Oscar L. Anders
Fountain, Colorado

Mr. Andy Anderson
Homebuilders Association of
Metropolitan Colorado Springs

Mr. Arthur M. Anderson
Victor, Colorado

Mr. Ray Anthony
West Side Action Group

Mr. & Mrs. Arthur Anderson
Bear Creek Canyon Association

Mr. Art Anderson
Victor Chamber of Commerce

Mr. Richard Anderson
Bureau of Land Management

Mr. Robert Andreason
Cascade Property Owners Association

Mr. John Asbury, Superintendent
Air Academy School District, UAFAA

Mr. Norton Bain
Colorado Springs, Colorado

Mr. Kenneth Baird
First National Bank

Mr. Alvin E. Born, Mayor
City of Woodland Park

Mr. Don Bergen
Colorado Springs, Colorado

Mr. Ed Baldwin, Director
Colorado Springs Planning Department

Mr. Huitt Barfoot
School District #2

Mr. Edwin Bland
Monument, Colorado

Mr. J. W. Bradbury
Woodland Park, Colorado

Mr. Gary Bohrer, Mayor
Town of Ramah

Mr. Wayne Bricker, Superintendent
Harrison School District

Mr. Don Brinton
State Representative

Mr. Charles Bradley, Chairman
Teller County Board of Commissioners

Dr. A. J. Bredall, Superintendent
Widefield School District

Mr. Dick Brown, City Administrator
City of Fountain

Mr. Don Brown, President
Monument Sanitation District

Mr. Gary Broetzman, 208 Coordinator
State of Colorado

Mr. Will Brown
Bass Realty

Mr. Kenneth Burkett, Teaching
Administrator
Hanover School District

Mr. Joe M. Cantrell
Security, Colorado

Dr. & Mrs. James Busey
Manitou Springs, Colorado

Mr. Ralph K. Calabrese, Superintendent
Calhan School District

Mr. William Callahan, Superintendent
Cheyenne Mountain School District

Mr. & Mrs. Ron Campbell
Crystal Hills Homeowners Association

Mr. Tod Campbell
Colorado Springs, Colorado

Mr. Gene Childs, Superintendent
Skyway Park Water & Sanitation

Mr. Gene Clare
Florissant, Colorado

Mr. Robert Case
Colorado Springs, Colorado

Mr. John Cesario
Ivywild Sanitation District

Mr. Stephen Chuck, Chairman
City, County, PPACG Liaison Committee

Mr. Corky Cline
Homeowners of Village Seven

Mr. Howard Cloud
Tri-Lakes Businessman's Association

Ms. Evelyn Coats
Peyton, Colorado

Mr. Bob Cole
Northeast Civic Association

Chairman
Colorado Mountain Club
Pikes Peak Group

Chairman
Colorado Springs Park and Recreation
Board

Colorado Wildlife Federation
Boulder, Colorado

Mr. William Comer
State Senator

Mr. Frank Conlon
Woodmoor Water & Sanitation District

Mr. Daniel J. Connor
Colorado Springs, Colorado

* Council on Environmental Quality
Washington, D. C.

W. Roger Craig, Lt. Colonel
USAF Academy

Mr. Thomas R. Cross, Town Attorney
Town of Palmer Lake

Mr. William Curtis
Falcon Estates Association

Mr. Robert Daniel
Colorado Springs, Colorado

Mr. Gary L. Danks
Town of Green Mountain Falls

Mr. L. B. Delabar
Ent/Golf Acres Area

Mr. Evan Dildine
Colorado Water Quality Control
Commission

Mr. Thomas Doherty, Superintendent
C. S. School District #11

Dr. Charles H. Dowding, Jr., Admin.
City/County Health Department

Mr. George Dragosh
Colorado Springs, Colorado

Mr. Steven Durham
Colorado Springs, Colordao

Mr. Howard Ehlers, Secretary
Rainbow Valley Water District

Chairman
El Paso County Park and Recreation
Board

Mr. Howard Emrich, President
Broadmoor Inprovement Society

Environmental Defense Fund
Denver, Colorado

Mr. Robert Ermel
District #10 Water Commissioner

Mr. Tom Evans
Colorado Springs, Colorado

Mr. Harold Evetts, Teaching
Administrator
Miami-Yoder School District

Mr. Waldo Ewing, Superintendent
Peyton School District

Federal Highway Administration
Denver, Colorado

Mr. Gene Fisher, 208 Project Director
Pueblo Area Council of Governments

Mr. William Flanery
State Representative

Dr. Dean Fleischauer, Superintendent
Fountain School District

Mrs. Mary Fluegel, Superintendent
Edison School District

Mr. W. E. Fluhr
Colorado Springs, Colorado

Ms. Alice Foote, Secretary
Palmer Lake Sanitation District

Mr. Norman C. Foote, Administrative Assistant
Lewis Palmer School District

Mr. G. N. Free, Jr.
Chapel Hills, Cheyenne Canyon and Cherokee Water and Sanitation Districts

Friends of the Earth
Denver, Colorado 80206

Ms. Kala Fuller
San Miguel Street Association

Mr. Paul Gerdes
Colorado Springs, Colorado

Mr. Kimball E. Goddard
U. S. Geological Survey

Mr. Fred Goldsby, Chairman
Academy Water & Sanitation District

Mr. Ted Gooding
Yorkshire Estates Association

*Mr. Roland Gow, Executive Director
Pikes Peak Council of Governments

Chairman
Green Mountain Falls Planning Commission

Mr. Steve Guass
El Paso County Highway Department

Mr. Russell A. Gugeler
Westwood Lakes Water Board

Mr. Bill Gullikson, President
Izzak Walton League

Mr. Francis Guthrie
Calhan, Colorado

Mr. Charles Haase
Colorado Springs, Colorado

Mr. Alfred A. Hagedorn
Colorado Springs, Colorado

Mr. George Hemming
Teller County Health Department

Mr. Dick Henninger
Colorado Springs, Colorado

Mr. Don Henry
Old Garden Ranch Homeowners Association

Dr. Arthur C. Herzberger
State Representative

Mr. William Hinkley, Chairman
Public Services Commission

Mr. William J. Hughes
State Senator

Mr. Barry Huebert
Colorado Springs, Colorado

Mr. Robert Hunt
Pleasant View Estates

Mr. Robert M. Isaac, Chairman
Pikes Peak Area Council of Governments

Mr. Richard Janitell
Garden Valley Water & Sanitation District

Mrs. Winnifred Jenson
Colorado Springs, Colorado

Col. Samuel Jordan
Mesa Northwest Homeowners Association

Mr. Larry Kallenberger
Teller County Planning Department

Mr. J. D. Keenon
Fountain, Colorado

Dr. Ray Kilmer, Superintendent
Lewis Palmer School District

Mr. Larry King, Mayor
Town of Calhan

Mr. Frank Klotz, Chairman
Republican Committee

Mr. Bob Kochera
Manager for Wastewater Division

Mr. John Kolisek
Colorado Springs, Colorado

Mr. Ken Kramer
Colorado Springs, Colorado

Mr. Bob Knudson
Southeastern Colorado Springs
Protection Association

Ms. Mary Kyer
Colorado Springs, Colorado

* Honorable Richard D. Lamm
Governor of Colorado

Mr. Warren Langer, Mayor
Town of Monument

Col. Richard A. Leonard, District Engineer
Albuquerque District Corps of Engineers

Mr. J. W. Lucas, Regional Forester
U. S. Forest Service

Mr. Mel Lucero
Vista Grande Area

Mr. James G. Lunghofer
Pleasant Valley Association

Mr. Jim Mayes
Fountain Chamber of Commerce

Mr. James E. McClelland, President
Black Squirrel Soil Conservation
District

Mr. James McCurdy
Bonnyville Homeowners Association

Chairman
Manitou Springs Planning Commission

Mr. Rudy Melena
Conejos Street Area

Ms. Helen McMillan
Holland Park Community Association

Mr. Gary Miller, Superintendent
Manitou Springs School District

Mr. George N. Miller, Mayor
City of Manitou Springs

Mr. Tom Milligan
Teller County Land Use Administrator

Mr. Kingston G. Minster
State Senator

Chairman
Monument Planning Commission

Mr. John Moseley, Executive Director
Colorado Springs Board of Realtors

Mr. Robert F. Mott, Director of
Administration
El Paso County Community Development

Mrs. James Munson
State Representative

National Wildlife Federation
Denver, Colorado

Mr. Don Nielson, District Conservationist
Colorado Springs Work Unit

Capt. David A. Nuss
Peterson Air Force Base

Mr. Lawrence D. Ochs, Mayor
City of Colorado Springs

Mrs. Patti F. O'Rourke
Water Quality Control Commission

Mr. Tom Osterman
Colorado State Forest Service

Mr. Frank Otoupalik
City/County Health Department

Mr. Jack Owen, President
Westwood Lakes Water Board

Mr. R. L. Palmer, Mayor
Green Mountain Falls

Chairman
Palmer Lake Planning Commission

Mr. Frank J. Parisi
Pulpit Rock Land Company

Mr. Charles B. Parker, Vice President
Cherokee Water District

Mr. Evert Paulson
Calhan Sanitation District

Mr. Bud Peiffer
Two Mile High Club of Cripple
Creek

Mr. Jim Perry
Widefield Homes Water &
Sanitation District

Mr. Harold Peto
Teller County Water & Sanitation
District #1

Mr. Jim Phillips, Director
Colorado Springs Department of
Public Utilities

Mr. & Mrs. John Pieper
Calhan, Colorado

Mr. Donald C. Polley
Fountain, Colorado

Mr. Jack Power
Cascade, Colorado

Mr. John Price
Woodmoor Water & Sanitation District

Mr. Elson Pritz
Colorado Springs, Colorado

Mr. Daniel E. Quigley
Colorado Springs, Colorado

Ms. Charlotte Quist
Colorado Springs, Colorado

Mr. Chuck Reese, Secretary
Forest View Acres Water District

Mr. Bev Reinitz
Northend Homeowners Association

Mr. Charles E. Reser, Supervisor
School District # 11 Representative

Mr. Dave Roberts
Building Inspector
City of Cripple Creek

Mr. Bruno Rancis
Manitou Springs Southside
Homeowners Association

Mr. Frank Reichardt, President
Jimmy Camp Sportsman Group

Mr. Tom Remple, Manager
Security Sanitation Water District

Mr. Ron Robenson
Colorado Springs, Colorado

Mr. B. G. Robinson, Mayor
City of Cripple Creek

Mr. James R. Ross, Executive Director
ENPAC

Mr. Max Rothschild, Director
El Paso County Department of
Public Works

Mr. Frank Rozich, Director
Water Quality Control Division
Colorado Department of Health

Mr. Stephen Sampson
Colorado Springs, Colorado

Ms. Ann Sandmore
Eastborough Area

Mr. Arthur Sapp
Colorado Springs, Colorado

Mr. Vern Schmitt
Pike National Forest

Mr. Ernest Schwarzer
Chelton - LaSalle Streets
Neighborhood Association

Mr. Ted Schubert
High Plains Land Use Commission

Chairman
Security Parks and Recreation Board

Mrs. Lynn Seese
Council of Neighborhood
Organizations

Mr. James Severson
Colorado Springs, Colorado

Mr. John Sherak
Woodmen Water & Sanitation District

Mr. Harris Sherman, Executive Director
Colorado Dept. of Natural Reources

Mr. John Shoemaker
Cascade Public Service Company

Mr. Golden Simmons
Cragmor Neighborhood Association

Mr. Luther Slabaugh
Monument, Colorado

Mr. Bruce Somners, Chairman
Ecology & Environment
Colorado Springs Chamber of Commerce

Mr. Eric W. Sonderman
Colorado Springs, Colorado

Ms. Ann Sorton
Northeast Garden Ranch Homeowners
Association

Mr. Thomas Speer
Colorado Springs, Colorado

Mr. Ted Spiewak
Red Rock Valley Estates Water District

E. J. Sprague
Colorado Springs, Colorado

Mr. Lowell R. Stanley
Ampex

Mr. John Stansfield
Colorado Springs, Colorado

* State Conservationist
U. S. Soil Conservation Service

* State Clearinghouse
Office of State Planning

* State Historical Society
State Archaeologist

Mr. Marvin Stein, Chairman
Pueblo Regional Planning Council

Col. Albert Stoll, Chairman
Committee for Preservation of
Black Forest

Ms. Mary C. Taylor, President
Colorado Open Space Council

Mr. Ralph Taylor, Superintendent
Cheyenne Canyon Sanitation District

Ms. Ruth Taylor
Rustic Hills Homeowners Association

Chairman
Teller County Planning Commission

Mr. John Theis
Golden Hills Association

Mr. David Thomas
Aiken Audubon Souciety

Ms. Ellen Thomas
Uintah & Union Area Homeowners
Association

Mr. Lloyd Tharp
Colorado Springs, Colorado

Mr. William Tiedt
Teller County Attorney

Dr. Donald Tolbert, Superintendent
Falcon School District #49

Mr. Vern Totten, Superintendent
Ellicott School District

* Regional Director
U. S. Bureau of Sports, Fisheries
and Wildlife, Region VI

* Regional Director
U. S. Department of Health
Education and Welfare

* Regional Administrator
U. S. Department of Housing and
Urban Development

* Director
U. S. Department of Interior

Mr. Randall Warthen, Mayor
Town of Palmer Lake

Mr. Jules Watson
J. H. W. Investment Company

Mr. Cecil Wayman, Chairman
Skyway Park Water &
Sanitation District

Mr. Ken Webb
Colorado Department of Health

Ms. Wynn Weidner
AAUW

Mr. Andrew H. Weigel
Colorado Springs, Colorado

Mr. Fred Weisbrod, Executive
Director
Pueblo Area Council of Governments

Mr. Carl Wiese
Fountain, Colorado

Ms. Clark Wilder
SPABA

The Wilderness Society
Denver, Colorado

Mr. Bill Wildman
El Paso County Land Use Department

Rev. Douglas M. Williams
LOGOS

Mr. Ken Wilson, Chairman
Rock Creek Mesa Water District

Mr. Craig Withee
DFAE, Ft. Carson

Mr. & Mrs. Lester Wiley
Taxpayers of El Paso County, Inc.

Chairman
Woodland Park Planning Commission

Mr. Bob Wunderle
Villa Loma Civic Association

Mr. James Young
Colorado Springs, Colorado

Mrs. Charles Zeigler, President
League of Women Voters

Mrs. Ann Zwinger
Colorado Springs, Colorado

* EPA Headquarters and Regional
EIS Coordinators

* Mr. Jasper H. Coombes
Chief, Engineering Division
U.S. Army Corps of Engineers

* Mr. Mark Rey
National Forest Products Association

APPENDIX C

COMMENT LETTERS RECEIVED BY EPA

1. Council on Environmental Quality
2. Pikes Peak Area Council of Governments
3. The State Historical Society of Colorado
4. Corps of Engineers, Albuquerque District
5. Soil Conservation Service
6. Fish and Wildlife Service, Colorado-Utah Area Office
7. U.S. Department of Health, Education, and Welfare
8. U.S. Department of Housing and Urban Development
9. State of Colorado

EXECUTIVE OFFICE OF THE PRESIDENT
COUNCIL ON ENVIRONMENTAL QUALITY
722 JACKSON PLACE, N. W.
WASHINGTON, D. C. 20006

APR 13 1977

Dear Mr. Green:

This is in response to your March 22, 1977 letter to Chairman Warren requesting the Council's concurrence in a shortening of the review period for the environmental impact statement (EIS) prepared on the 208 Water Quality Management Plan for El Paso and Teller Counties, Colorado, pursuant to Section 1500.11(e) of the CEQ Guidelines.

We have reviewed your request, which involves maintaining the 45 day review and comment period for the draft EIS, but shortening the review period for the final EIS from 30 to 20 days.

Your request is based on the need to comply with the requirements of P.L. 92-500 that EPA approve, disapprove or conditionally approve a 208 plan within 120 days from the date the plan was certified by the Governor, which in this instance means that EPA must make a decision by June 7, 1977. Because of this exceptional circumstance, and because the proposed plan was apparently developed with substantial participation on the part of government agencies and the general public, we concur in your request to shorten the review period on the final EIS to 20 days. However, we believe that it is important that the final EIS adequately address any comments received on the draft EIS.

Sincerely,

Nicholas C. Yost
Acting General Counsel

Mr. John A. Green
Regional Administrator
Environmental Protection Agency
Region VII
1860 Lincoln Street
Denver, Colorado 80203

PIKES PEAK AREA COUNCIL OF GOVERNMENTS

PPACG

27 EAST VERMIJO
COLORADO SPRINGS, COLORADO 809
PHONE (303)471-7080

RECEIVED
APR 25 1977
Planning Branch
Air and Water Programs Division

April 20, 1977

Mr. Terry Anderson
U. S. Environmental Protection Agency Region VIII
1860 Lincoln Street
Denver, Colorado 80203

Dear Mr. Anderson:

At its regular meeting on April 13, 1977, the Pikes Peak Area Council of Governments reviewed the draft EIS on Project Aquarius. The PPACG has asked me to pass on the comments noted below for your consideration in developing the final EIS.

- Page 6 -- The Draft states that the recommendations in Table 2 are "separated into high and low priority categories based on PPACG's determination of their significance."

  COMMENT: This statement is not correct, in that PPACG has not listed high priority and low priority concerns as noted in the draft EIS. The Draft is close to correct in what would be high priorities and low priorities but has neither staff nor elected official sanction. It is felt that Item 10, for example, on the lower priority recommendation list is of fairly high concern to the Pikes Peak Region. This relates to the U. S. Forest Service's increase in funding for the maintenance of recreational forests.

- Page 11 -- The statement is made "the State's position on the stream segment (i.e., Fountain Creek from its confluence with Monument Creek down to the Colorado Springs wastewater treatment plant) is that it should remain classified for fisheries and that the present water quality criteria should remain in effect." This paragraph on stream classification also states that "the State did not accept all of the "208" Plan's recommendation regarding stream classifications and exceptions for water quality criteria for the Lower Fountain Creek segment."

  COMMENT: The "208" Plan recommended that Fountain Creek from its confluence with Monument Creek be classified as A-2-C with exception for chlorine residual and ammonia and for a short segment of stream below the Colorado Springs treatment facility dissolved oxygen of 4.0 instead of 5.0 mg per liter. The recommended classification in the Addendum to the Plan which was accepted by the Colorado Water Quality Control Commission was that the stream be classified in this same segment as secondary recreation and ground water recharge. At the present time the stream is classified as B-2. Item 6 in the State's Letter of Certification to PPACG and to EPA indicates that the State will consider the recommendations made by the "208" Plan for stream classifications for interim decision-making, until it reclassifies the streams according to a newly revised stream classification system currently under consideration. The only bone of contention with the State was the segment of Lower Fountain Creek and, in fact, the intent of the State appears very clearly to be to accept the exceptions of chlorine residual, ammonia, and dissolved oxygen, for most of the Monument and Lower Fountain stream system. This is reinforced by the State's extension of the dissolved oxygen limitation to a point below the City of Fountain which was not recommended in the "208" Plan. When the State accepted the Plan with its Addendum, the recommended classifications clearly indicated, and the State clearly recognized, that the aquatic life standards were not appropriate on the Fountain-Monument system except in the headwaters of Monument Creek, from its source to Monument Lake, and in the headwaters of Fountain Creek from Crystola Creek to its confluence with Monument Creek. The EIS should reflect this point of view.

- Page 11 -- It is stated that "recognizing that the discharge of sludge into Fountain Creek by the Colorado Springs waste treatment plant is one of the most serious and immediate point source problems. . . ."

  COMMENT: The Plan did not recognize that the discharge of sludge into Fountain Creek was in fact a problem. No mention was made in the Plan of the discharge of sludge directly to the Creek. It is important to note that recent events with regard to the Colorado Springs sewage treatment system should not cloud the thinking of the writers of current reports when they reflect upon the Plan that was written during the early part of 1976. PPACG and its staff has no knowledge of direct discharges of sludge into Fountain Creek.

  At the present time the City of Colorado Springs is in dire need of an expanded sludge handling capability. It is diligently at work on this process in order to protect Fountain Creek's aquatic biota, its water quality, and the water quality of the Widefield aquifer and other water supply sources.

- Page 13 -- The report states "the State did not specifically designate management agencies for land use review and non point sources."

COMMENT: It should be borne in mind that land use controls are the prerogative of general purpose government and that storm drainage systems and individual sewage disposal permits are also normally operated or controlled by general purpose government. Special purpose governments such as water and sanitation districts also have the authority to control storm runoff. These authorities exist in Colorado Statutes. As a result, the State has already, in fact, designated management agencies for the critical activities of land use control and non point source pollution control. This same statement would apply to Point 9 which is also raised on page 13 with regard to the rejection of the recommendation for the Upper Fountain Creek's sub-basin management agency. In fact, by not designating a specific management agency the State has allowed the current situation of Municipal and County control to continue to exist until such time as the two entities in that area can get together on a cooperative basis. It is fully expected that this will be done within the one-year period of the condition.

- Page 18 -- EPA reports that the violations of the hydrocarbon and suspended particulate standards will occur using the population growth projections mentioned in the Plan. It further goes on to state that the issue is one of growth, and suggests that this growth would result directly from the provision of expanded sewage services. The recommended action here is that EPA will not participate in the construction funding of any wastewater treatment plant expansions especially in the Fountain and Security areas until air quality studies are completed.

COMMENT: Penalizing water quality because of an air quality factor is hardly the way to get clean water. Emerging Congressional philosophy appears to be that once air quality maintenance plans and transportation control strategies are developed, then if implementation is slow, instead of withholding sewage treatment funds, transportation development funds will be withheld. This makes more sense than holding up needed sewage construction funds. Since the Pikes Peak Area Council of Governments, in cooperation with the State, EPA and with the County Health Department, is in the process of developing an air quality maintenance plan, and has been in the forefront of trying to examine the impacts of growth on air quality, penalizing local entities because these studies are incomplete is not equitable. The stated posture will contribute nothing to either cleaning up air pollution or water pollution.

It should also be noted that the Pikes Peak Air Quality Maintenance Area is not consistent with the "208" planning area as the AQUA consists only of El Paso County.

PPACG views the provision of sanitation services as a means by which growth is accommodated and guided, not a means to controlling how much growth occurs in the Region. It is strongly felt by the elected officials of this area that the provision of services to meet demands is as important as guiding where those demands take place. Since it is not possible to control the number of people who actually come here by any local effort, we see no reason for EPA to be in the position of controlling the kind of growth that occurs in the Pikes Peak Region. As a point of information, and this is related to the statement on page 20 regarding the rationale under Item C - the allocations of growth to various segments of the area was done with the protection of a flood plain and unique ecological and scenic resources and the cost of public services in mind.

- Page 21 -- The statement is made "the Colorado Springs Department of Public Works has accepted the Urban Drainage Criteria Manual."

COMMENT: This is not wholly correct; both the El Paso County Department of Transportation and the Colorado Springs Department of Public Works have administratively accepted the Urban Drainage Manual for use in review of drainage design and subdivisions.

- Pages 23 and 26 -- with regards to comments under Item F and Item M regarding the development of a summary plan implementation document.

COMMENT: PPACG feels that the planning process is a continuous operation leading towards implementation of plans. In this regard its philosophy does not differ from that of EPA. However, we do feel that the development of any further documentation on Project Aquarius ought to be done with continuing funding and that documentation should be in the products developed from a Work Program that results from continued funding. It is worthwhile noting that it took about two years to complete the Plan; the review process will have taken close to one year. We strongly urge that annual Work Programs be used as statements of policy and priorities for the implementation of the whole Project Aquarius. Implementation of the whole plan will take a long period of time before it can be fully accomplished, indeed the planning horizon is the year 2000, and we should not expect implementation of the current plan to occur without revisions.

Given the State's conditions, which PPACG accepts, further documentation can and should be covered under the continuing process.

PPACG agrees with other EPA recommended actions in Table III, and not specifically addressed here, and will do everything within its power to assure that the plans and processes are carried out as expeditiously as possible.

Sincerely,

Roland Gow

Roland Gow
Executive Director

SW

THE STATE HISTORICAL SOCIETY OF COLORADO

State Archaeologist (Interim address) Pioneer Hall,
University of Denver, Denver 80210

May 3, 1977

Mr. John A. Green
Region VIII Environmental
Protection Agency
1860 Lincoln Street
Denver, CO 80203

Dear Mr. Green:

The Office of the State Archaeologist of Colorado has received and reviewed EPA's summary Draft Environmental Impact Statement, Water Quality Management Plan, El Paso and Teller Counties (March 1977).

The Statement does not apparently discuss archaeological resources. Archaeological resources should be considered under the National Environmental Policy Act of 1969, the Council on Environmental Quality's "Guidelines for the Preparation of Environmental Impact Statements" (36 CFR 20550), Executive Order 11593 of 1971, and the Council on Historic Preservation's "Procedures for the Protection of Historic and Cultural Properties" (36 CFR 800; see 16 USC 470f, as amended 90 stat. 1320) which implements the National Historic Preservation Act of 1966.

This required consideration of archaeological resources should be implemented in the earliest possible stage of planning. By delaying (until the later planning stages when project flexibility has diminished and specific sites have been selected), an unevaluated commitment of non-renewable archaeological resources is made. Site avoidance and many other mitigative options are often untenable at such later stages.

Based upon the provided information, the Environmental Protection Agency has not adequately addressed archaeological resources in this Draft Statement.

The State Historical Society's Department of Historic Preservation independently comments regarding historic/architectural resources.

If we can be of assistance in converging upon a mutually beneficial solution to the water-quality and cultural-resource obligations, please contact Staff Archaeologist David R. Stuart at (303) 744-1713 (after June: 839-3391).

For the State Historic
Preservation Officer

Bruce E. Rippeteau, Ph.D.
State Archaeologist Colorado

BER(DRS):ng
cc: Meehan, Pikes Peak COG
Monaghan, Colorado Executive Chambers
Schmuck, Division of Planning
Klein, Council on Environmental Quality
Wall, Council on Historic Preservation
Hart, SHPO

DEPARTMENT OF THE ARMY
ALBUQUERQUE DISTRICT. CORPS OF ENGINEERS
P. O. BOX 1580
ALBUQUERQUE. NEW MEXICO 87103

SWAED-EP

21 April 1977

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VIII
[illegible] CONTROL

Mr. John A. Green, Regional Administrator
United States Environmental Protection
Agency, Region VIII
1860 Lincoln Street
Denver, Colorado 80203

Dear Mr. Green:

In response to your notice of March 25, 1977, we have reviewed the draft environmental impact statement on the 208 Water Quality Management Plan for El Paso and Teller Counties, Colorado. The plan evaluated in the statement could have an adverse effect on the potential Fountain Lake project, especially if a multiple-purpose reservoir with flood control and recreation is the selected alternative. However, as stated in our letter to you of 18 March 1977, we have not progressed far enough in our formulation studies to give you a definitive answer regarding water quality at this time.

As you know, our preliminary water quality studies, to which you refer on page 17 of your draft environmental statement, indicate that existing discharges in Fountain Creek would adversely impact on a recreation pool at Fountain Lake. Even with the existing poor quality of water in Fountain Creek, a warm water fishery could be sustained in a Fountain Lake permanent pool. However, increased discharges of un-ionized ammonia and chlorine residual, as well as lowering of instream dissolved oxygen standards from 5 mg/1 to 4 mg/1 could further degrade the water quality of Fountain Creek and possibly have an adverse effect on establishment of a warm water fishery in Fountain Lake.

We appreciate the opportunity to comment on your draft environmental impact statement.

706

Sincerely yours,

J Coombes

JASPER H. COOMBES, P.E.
Chief, Engineering Division

UNITED STATES DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE
P. O. Box 17107, Denver, Colorado 80217

April 26, 1977

Mr. John A. Green
Regional Administrator
U. S. Environmental Protection Agency
1860 Lincoln Street
Denver, Colorado 80295

Dear Mr. Green:

Thank you for sending us a copy of the draft Environmental Impact Statement for the Water Quality Management Plan for El Paso and Teller Counties. We have reviewed the summary and associated documents and submit the following comments.

Since the draft Environmental Impact Statement does not present specific information concerning the sites upon which the wastewater treatment facilities will be constructed, we suggest the final EIS discuss the following items as they relate to construction activities.

a. Discuss the soil suitability and limitations for the proposed action.

b. Discuss the provisions for controlling soil erosion during and after construction.

c. Discuss the provisions for stockpiling topsoil during construction for later use in revegetation work.

In addition, we suggest the final EIS describe the impacts, favorable or adverse, on the following:

prime and unique farmlands, rare or endangered plants or animals, archeological sites, floodplains, and wetlands.

We believe further documentation is needed to support the conclusions reached concerning non-point sources of pollution. Statements on page 22 of the draft EIS and page 75 of the Water Quality Management Plan conclude that "agriculture, mining, and silviculture activities are not now a significant source of pollution". We feel the draft EIS fails to recognize the effects of sheet and gully erosion, erosion from deteriorated cropland and rangeland and erosion from streambank scouring. These non-point sources constitute a significant impact on water quality in the form of sediments to downstream areas. All eight Soil Conservation Districts, mentioned on page 230 of the

Water Quality Management Plan, identify erosion problems and have on-going programs to help individual landowners solve them.

We suggest the final EIS address the problem of non-point sources of pollution only as it relates to construction activities for wastewater treatment facilities. The agricultural related non-point sources are beyond the scope and magnitude of this EIS.

Thank you for the opportunity to review and comment on this project.

Sincerely,

Robert G. Halstead
State Conservationist

cc: R. M. Davis, Administrator, SCS, Washington, D.C.
Office of the Coordinator of Environmental Quality Activities
Office of the Secretary, USDA, Washington, D.C.
Council on Environmental Quality (5 copies)
Ken Kirkpatrick, State Soil Conservation Board
Roger Hansen, AC, LaJunta
Dennis Davidson, DC, Cripple Creek
Don Nielsen, DC, Colorado Springs

United States Department of the Interior
FISH AND WILDLIFE SERVICE
AREA OFFICE COLORADO—UTAH
1426 FEDERAL BUILDING
125 SOUTH STATE STREET
SALT LAKE CITY, UTAH 84138

In Reply Refer To (ES)

April 8, 1977

Memorandum

To: Environmental Protection Agency
Regional Office
Denver, Colorado

From: Area Manager
U. S. Fish and Wildlife Service
Salt Lake City, Utah

Subject: Draft environmental impact statement on the 208 Water Quality Management Plan for El Paso and Teller Counties, Colorado

We have reviewed the subject draft and associated documents, and offer the following comments for your consideration.

General Comments

Generally the proposed water quality management plan, and associated impacts on fish and wildlife, are adequately discussed. This kind of long term resource planning, as it relates to changing demands on the land, is difficult at best, and we would therefore recommend a close co-ordination effort with the Colorado Division of Wildlife should the plan be implemented.

Specific Comments

We do not believe that exceptions for unionized ammonia (NH_3) and residual chlorine levels are justified simply because lower Fountain C doesn't currently support a viable fishery. We do not agree with PPACG's conclusion that the use of such a fishery is unattainable. We are further concerned, that these exceptions to effluent ammonia and chlorine concentrations have the potential to cause toxicity problems in downstream waters as well. It is suggested that these and associated problems be looked at very closely before a final decision is made.

Thank you for affording us the opportunity to review and comment on this matter.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
REGION VIII
FEDERAL OFFICE BUILDING
19TH AND STOUT STREETS
DENVER, COLORADO
80294

May 3, 1977

OFFICE OF THE REGIONAL DIRECTOR

John A. Green
Regional Administrator
U.S. Environmental Protection Agency
1860 Lincoln Street
Denver, Colorado 80203

Dear John:

Thank you for the opportunity to review the draft environmental impact statement for the 208 Water Quality Management Plan for El Paso and Teller Counties, Colorado.

It appears that the impacts expected to result from the proposed project and reasonable alternatives thereto have been adequately addressed.

Sincerely yours,

Edwin R. LaPedis
Acting Regional Director

cc:
Office of Environmental Affairs
HEW, Washington, D.C.

Council of Environmental Quality
Washington, D.C. (2 copies)

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
REGIONAL OFFICE
EXECUTIVE TOWER - 1405 CURTIS STREET
DENVER, COLORADO 80202

REGION VIII

May 10, 1977

19/20

IN REPLY REFER TO:
8DE

Mr. John A. Green
Regional Administrator
Environmental Protection Agency
1860 Lincoln Street
Denver, Colorado 80203

Dear Mr. Green:

We have reviewed your Draft Environmental Impact Statement (EIS) on the 208 Water Quality Management Plan for El Paso and Teller Counties, Colorado transmitted to us on March 25, 1977.

As you know, under the Guidelines of the Council on Environmental Quality, this Department has been assigned responsibility for comments on EIS's pertaining to comprehensive planning and impacts on residential areas. Our principal concern with this statement is your inference that there will be growth-related impacts which may occur if the recommendations made in the 208 Water Quality Management Plan are implemented.

Though your Summary Sheet lists many of these growth-related impacts, there has been little attempt in the Draft EIS to show how a water quality management plan will effect growth. There is no discussion on what could be done to mitigate any adverse effects of this projected growth and many of the identified impacts were not thoroughly discussed.

Enclosed are two HUD documents which may help you to address some of these areas. The Noise Assessment Guidelines provides an outline of how to assess noise emanating from railroads, airports and roadways for both present and future conditions, while the Guide for Social Environmental Assessment lists various social areas which need assessment.

Thank you for this opportunity to comment on this Draft EIS.

Sincerely,

Sandra K. Woods

Robert J. Matuschek
Assistant Regional Administrator
Community Planning and Development

7512

Enclosures

MAY 12 '77

Insuring Offices
Casper, Wyoming - Denver, Colorado - Fargo, North Dakota - Helena, Montana - Salt Lake City, Utah - Sioux Falls, South Dakota

State of Colorado
EXECUTIVE CHAMBERS
DENVER

RICHARD D. LAMM
Governor

May 16, 1977

Mr. John Brink
Environmental Evaluation Branch
Environmental Protection Agency
1860 Lincoln
Denver, CO 80203

Dear John:

As a follow-up to our discussion on the telephone this morning, here are copies of three letters received on the abbreviated draft EIS being prepared for the PPACG 208 plan.

Each of these three letters pose some concerns and questions that deserve the attention of both EPA and the State possibly now or in the near future.

Sincerely,

Gary
Gary G. Broetzman
State 208 Coordinator

Attachments

COLORADO DEPARTMENT OF HEALTH
4210 E. 11TH AVENUE DENVER 80220 PHONE 388-6111 EXT. 329
ANTHONY ROBBINS, M.D., M.P.A. EXECUTIVE DIRECTOR

May 2, 1977

Mr. Phil Schmuck
Division of Planning
Department of Local Affairs
520 Centennial Building
INTERDEPARTMENTAL

RE: 208 Plan for El Paso and Teller Counties

Dear Phil:

The Department of Health's comments on the El Paso-Teller 208 Plan have been submitted to your office. Subsequent review of the check-off form letter (SOC-3) and the attached commentary dictates that a modification is appropriate in this particular instance. Instead of an affirmative check-off in the first box (see attached), the Department is now qualifying that statement by referring to the paragraph indicated with an asterisk in the body of the comments. In this instance we did not feel a strict "yes" or "no" could suffice, hence the change.

Sincerely,

Ron Simsick

Ron Simsick, Program Administrator
Colorado Department of Health

ggb

Enclosure

[illegible] [illegible] - A-95 (c)

COLORADO DEPARTMENT OF HEALTH

4210 E. 11TH AVENUE DENVER 80220 PHONE 388-6111 EXT. 329

ANTHONY ROBBINS, M.D., M.P.A. EXECUTIVE DIRECTOR

DATE: April 26, 1977

SUBJECT: NON-STATE ASSISTANCE

REVIEW AND COMMENTS

TO: Phil Schmuck
Dept of Local Affairs

TO: NA

PROJECT TITLE: 208 Plan for El Paso and Teller Counties

STATE IDENTIFIER: ESR #77-107

COMMENTS DUE BY: 4/22

Yes ☒	No ☐	Is this project consistent with the goals and objectives of this agency?
Yes ☐	No ☒	Is there evidence of overlapping of duplication with other agencies?
Yes ☐	No ☒	Is meeting desired with applicant?
Yes ☐	No ☒	A 15-day extension is requested.

Comments: Air Pollution Control Division: The Division's primary concerns with all 208 Plans are: that air quality is adequately considered during the planning process, and that the Plan will not allow areas in the State to degrade current air quality. The 208 Plan for El Paso and Teller Counties did, in the Division's opinion, fulfill the first criteria. Air quality was addressed in the February 27, 1975 document entitled "Options for the Future, What Do They Mean?", and the April 12, 1976 report entitled, "Year 2000 Air Quality in the Pikes Peak Region". While we may not concur with the conclusions of either document, we do feel that PPACG made the effort to

Name, Title & Phone

SOC-3. Feb 77

ATTACHMENT B

C-17

include air quality considerations.

The second criteria relating to the 208 Plan's impact on current air quality is a complicated matter, and one not easily solved. The report, "Year 2000 Air Quality in the Pikes Peak Region", states, on page 13, that "a general deterioration in air quality over the region as a whole appears likely." Violations of standards for certain pollutants are projected by the year 2000. In addition, two recent draft reports by the EPA consultant, PEDCo Environmental, indicate that in the short term (1980 and 1985) both the particulate and carbon monoxide standards will be violated. Based on EPA's stated unwillingness to fund sewage treatment plants until air quality studies are completed (presumably EPA is referring to the Air Quality Maintenance Planning effort) the Colorado Springs area should, as rapidly as possible, develop implementable air pollution reduction and maintenance strategies.

The Division's final comment relates to the draft EIS. They are unable, at this time, to judge the accuracy of the statement on page 19 that "on ground location of growth is not the critical factor in air quality degradation". They would not like to see a 208 Plan that completely locks out an alternative population distribution as a potential air pollution reduction strategy.

Ron Simsick, Program Administrator

STATE DEPARTMENT OF HIGHWAYS

JACK KINSTLINGER EXECUTIVE DIRECTOR

DIVISION OF HIGHWAYS
E. N. HAASE
CHIEF ENGINEER

COLORADO STATE PATROL
COL. C. WAYNE KEITH.
CHIEF

STATE OF COLORADO

4201 EAST ARKANSAS AVENUE • DENVER COLORADO 80222 • (303) 757-9011

April 26, 1977

RECEIVED
APR 29 1977
DIVISION OF
PLANNING

Mr. Philip H. Schmuck
Director
Colorado Division of Planning
520 Centennial Building
1313 Sherman Street
Denver, Colorado 80203

RE: Teller and El Paso Counties 208 Plan

Dear Mr. Schmuck:

The Colorado Department of Highways has completed its review of the Draft Environmental Impact Statement for the Areawide Water Quality Management Plan for Teller and El Paso Counties and its supporting documents. As a result of our review we would like to offer the following comments.

The format used in the subject DEIS departed significantly from standard DEIS format. The DEIS as presently structured presents the State's and EPA's reaction to the proposed 208 plan with little explanation of what the plan for Teller and El Paso counties looks like or accomplishes. In order to ensure that the DEIS is a full disclosure document, the actual plan prepared in response to Section 208 of the Federal Water Pollution Control Act Amendments (P.L. 92-500) should have been summarized in the DEIS. Many individuals will read the DEIS expecting to be briefed on the plan and its current status. However, without a brief summary describing the water quality planning and management process developed during the initial two year planning period, the document's value as an educational tool is severely diminished.

The Colorado Department of Highways endorses the recommendations made by EPA regarding further refinement and approval of the plan. EPA's recommendations appear to be consistent with the State's position on these matters. In the development of the work program for the next round of water quality management planning by PPACG the Highway Department would like to see the following concerns addressed.

1) Have the Colorado Springs Transportation Improvement Program and the PPACG input to the CDH Five-Year Highway Construction Program been formulated incorporating Project Aquarius objectives?

2) How does the current Five-Year Construction Program contribute to changes in land use, thereby affecting plans for control of stormwater run-off and for wastewater treatment facilities?

3) Have the growth-stimulus effects of transportation projects been considered with plans for regionalized or consolidated wastewater treatment?

4) Who will continuously coordinate planning for transportation and water quality management?

5) Will the responsibilities of PPACG Transportation Advisory Committee change to reflect the concerns for water quality? If so, what will these new responsibilities include?

6) Will the Environmental Protection Agency through the PPACG promulgate criteria to be applied during highway project impact assessment studies to ensure consistency between transportation and water quality goals, policies, programs and plans?

7) What additional erosion controls and standards for highway project construction, if any, are anticipated by the Environmental Protection Agency, and will potential chemical pollutants such as de-icers, pesticides and herbicides be restricted?

Thank you for providing the Colorado Department of Highways the opportunity to review and comment on the subject documents.

Very truly yours,

Jack Kinstlinger
Executive Director

AP/jc

THE STATE HISTORICAL SOCIETY OF COLORADO
State Archaeologist (Interim address) Pioneer Hall,
University of Denver, Denver 80210

May 3, 1977

MAY 5 1977
DIVISION OF
PLANNING

Mr. John A. Green
Region VIII Environmental
Protection Agency
1860 Lincoln Street
Denver, CO 80203

Dear Mr. Green:

The Office of the State Archaeologist of Colorado has received and reviewed EPA's summary Draft Environmental Impact Statement, Water Quality Management Plan, El Paso and Teller Counties (March 1977).

The Statement does not apparently discuss archaeological resources. Archaeological resources should be considered under the National Environmental Policy Act of 1969, the Council on Environmental Quality's "Guidelines for the Preparation of Environmental Impact Statements" (36 CFR 20550), Executive Order 11593 of 1971, and the Council on Historic Preservation's "Procedures for the Protection of Historic and Cultural Properties" (36 CFR 800; see 16 USC 470f, as amended 90 stat. 1320) which implements the National Historic Preservation Act of 1966.

This required consideration of archaeological resources should be implemented in the earliest possible stage of planning. By delaying (until the later planning stages when project flexibility has diminished and specific sites have been selected), an unevaluated commitment of non-renewable archaeological resources is made. Site avoidance and many other mitigative options are often untenable at such later stages.

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The State Historical Society's Department of Historic Preservation independently comments regarding historic/architectural resources.

If we can be of assistance in converging upon a mutually

Mr. John A. Green
Page 2
May 3, 1977

beneficial solution to the water-quality and cultural-resource obligations, please contact Staff Archaeologist David R. Stuart at (303) 744-17[illegible]3 (after June: 839-3391).

For the State Historic
Preservation Officer

Bruce E. Rippeteau, Ph.D.
State Archaeologist Colorado

BER(DRS):ng
cc: Meehan, Pikes Peak COG
Monaghan, Colorado Executive Chambers
Schmuck, Division of Planning
Klein, Council on Environmental Quality
Wall, Council on Historic Preservation
Hart, SHPO